



EUROPEAN ANTI POVERTY NETWORK

EAPN  
structural funds  
manual  
2009-2011

by Brian Harvey

Third edition, December 2008



EUROPEAN ANTI POVERTY NETWORK

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For more information see:

**[http://ec.europa.eu/employment\\_social/progress/index\\_en.html](http://ec.europa.eu/employment_social/progress/index_en.html)**

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Public action, Graz, Austria 2007 (c) lynn@art / Armutskonferenz



Participation creates new personal and work opportunities – CEPAIM, member of EAPN-Spain

# INTRODUCTION

This is the third in a series of manuals published by the European Anti Poverty Network (EAPN) for its members and more broadly for social inclusion Non Governmental Organizations (NGOs) determined to ensure that the structural funds are effective instruments for making Europe a more inclusive society. Poverty remains an acute problem in Europe, with 78 million people living below the poverty line, 16m people unemployed and up to 3 million homeless. Taken together, the structural funds make up one of the main financial instruments of the European Union and offer the opportunity to attack Europe's gravest social problem.

The previous manual outlined the present, 2007-2013 round of the structural funds at their point of introduction. This, the third manual, does not repeat the detail from this period, although it is alert to ways in which the practice of the structural funds have, in the areas that concern us, changed. Its main aim is to focus instead on how NGOs can be a critical voice for social inclusion in the structural funds; how to use the opportunities that are still there; how to participate in the post - EQUAL arrangements; and first guidance in how to look to the next round. The manual identifies the points at which NGOs can still challenge their governments to be more effective in using the funds. It provides a combination of information, examples, case studies, advice, suggestions and practical tips. Checklists are provided as action points for social inclusion NGOs to consider. Good practice case studies are used to illustrate the participation of NGOs in the new round. And for the sake of balance, some 'bad practice' examples are also included ☹.

This manual was compiled through examination of the documentation prepared by the European Commission and the national governments in the course of the introduction of the current structural funds programming period; requests to EAPN members to provide information on their participation with case studies to illustrate that experience; enquiries to both European Social Fund and European Regional Development Fund desk officers in the Commission for information on the participation in the structural funds of social inclusion NGOs and subsequent enquiries to national governments. The writer is most grateful to those who responded and gave so generously of their time and attention. They are thanked in the acknowledgments at the end.

## GLOSSARY OF TERMS AND ACRONYMS

<b>CIP</b>	Community Initiative Programme, a Europe wide funding programme found in earlier structural funds
<b>Civil society</b>	Concept of a space where society organizes itself independently, free from government control, where NGOs and associations are found
<b>Cohesion fund</b>	An fund for transport and environmental projects in poorer member states
<b>Cohesion policy</b>	The policy developed by the European Union for closing the gap between its poorer and more affluent regions
<b>Competitiveness</b>	Competitiveness regions, mainly the older, wealthier states
<b>Convergence</b>	Convergence regions, those most targeted for structural fund assistance, mainly the new member states
<b>CSGs</b>	Community Strategic Guidelines, principles issued for the structural funds
<b>Desk officer</b>	The Commission official responsible for the structural funds in a particular country (or groups of countries)
<b>DG</b>	Directorate General, the principal administrative unit of the European Commission, followed by a shorthand name, like REGIO (regional affairs), EMPL (employment)
<b>EAPN</b>	European Anti Poverty Network
<b>Earmarking</b>	Allocation a proportion of the structural funds in each country to support the Lisbon strategy (q.v.)
<b>ESF</b>	European Social Fund
<b>EQUAL</b>	The CIP to promote equality and social inclusion over 2000-6
<b>ERDF</b>	European Regional Development Fund



<b>GDP</b>	Gross Domestic Product
<b>GNP</b>	Gross National Product
<b>Horizontal principle</b>	Applying a particular value or discipline across all the structural funds (e.g. gender, environment, social inclusion)
<b>IP</b>	Implementation plans, explaining how the funds will operate at the greatest level of detail
<b>Lisbon strategy</b>	The strategy agreed by the European Council in 2000 to make the European Union the most dynamic, competitive, knowledge-based economy in the world
<b>n+2</b>	The principle whereby structural funds must be spent within two years of the period for which they are allocated
<b>MEP</b>	Member of the European Parliament
<b>NAPSIIncl</b>	National Action Plan for Social Inclusion, plans adopted by each member state to fight poverty and exclusion, under a common European template, the social inclusion strategy.
<b>NDP</b>	National Development Plans, national documents outlining structural fund (and sometimes other spending) in more detail
<b>NGO</b>	Non Governmental Organization
<b>NSRFs</b>	National Strategic Reference Frameworks, national documents to guide the structural funds
<b>OP</b>	Operational Programme
<b>Partnership</b>	The concept that structural funds should be planned and managed by a combination of government, different authorities, social partners, NGOs and civil society
<b>Programming period</b>	The European Union's finances operate in programming periods which run for seven years at a time, e.g. 2007-2013
<b>Social partners</b>	Employers, trade union and farmer organizations, who may work formally with government on economic and social policy (social partnership)
<b>Structural funds</b>	The European Union's funds to promote development. There are two funds: the ESF and the ERDF

CHAPTER 1

# OUTLINE OF 2007-2013 PROGRAMMING PERIOD

Chapter 1 introduces the reader to the structural funds, the present programming period and the partnership principle. 2007-2013 is the fourth round of the reformed structural funds (the previous rounds were 1988-93, 1994-9, 2000-6). The introduction of the 2007-2013 structural funds saw three important developments:

- First, the structural funds retained an important role in redistributing resources from the richer and toward the poorer regions. Inequality in Europe continued to be seen as a regional problem, of rich and poor regions and *places*, not a social policy issue, of rich and poor *people*.
- Second, more power was devolved to national administrations to decide on and deliver the structural funds, with an ever lighter system of monitoring ('subsidiarity').
- Third, the funds were simplified, with only three regions (convergence, competitiveness, territorial cooperation) and only two funds (the European Regional Development Fund (ERDF) and the European Social Fund (ESF)). There were no more Community Initiative Programmes, from which social inclusion NGOs had been substantial beneficiaries (e.g. the EQUAL programme (> Chapter 7)).

Overall, EAPN was disappointed that the 2007-2013 programming period was not made a more effective instrument to combat poverty and social exclusion. The Commission's own estimates were that only 12.4% of the ESF was allocated to social inclusion measures. There was little use of global grants or technical assistance to enable social inclusion NGOs to play a more active part in the structural funds (> Chapter 3). Significant programmes still seemed to be closed off from NGOs and are instead used by governments for routine programmes, rather than to make fresh efforts to combat poverty.

## AN INTRODUCTION TO THE 2007-2013 PROGRAMMING PERIOD

The present round of the structural funds, 2007-2013, was designed in 2003. The regulations were introduced in 2004 and approved in 2006, in time to come into operation in 2007. As before, it took the member states and the Commission between 18 and 36 months to put the new round fully into operation. Under what is called the  $n+2$  principle, structural funds money can continue to be spent up to two years after the period for which it is allocated, so that some spending under the 2000-6 round did not conclude until the end of 2008. Likewise, 2007-2013 spending does not have to conclude until December 2015.

SPENDING OF THE STRUCTURAL FUNDS FOR 2007-2013 IS ALLOCATED UNDER THREE HEADINGS:

Objective	Location
Convergence areas	Regions with less than 75% EU average Gross Domestic Product
Competitiveness areas	The rest
Cooperation	Cross border areas

Most of the funds, over three quarters, go to the poorer regions. These are mainly the new member states that joined the E.U. in or after 2004: Slovenia, Slovakia, the Czech Republic (except for the region around Prague), Hungary, Latvia, Lithuania, Estonia, Poland, Malta, Bulgaria, Cyprus and Romania. Convergence areas also include some poor regions in the old member states: most of Greece, most of Portugal (but not Algarve or Lisbon), Eastern Germany (the former German Democratic Republic) except Berlin, North East Lower Saxony, southern Italy (except Molise), the overseas departments of France, the South and East of Spain (and the Canary islands) and in Britain, West Wales and the South west. The level of financial assistance from the EU is much higher in the convergence regions, 75%, compared to only 50% in the competitiveness regions where 50% co-financing must be sought from other sources. In addition, the Cohesion Fund operates in member states whose Gross National Income is less than 90% of the European Union average. This fund focuses on transport and environmental projects and brings an even higher level of financial assistance, 85%.

When we use the term 'the structural funds', we mean the two structural funds: the European Regional Development Fund (ERDF) and the European Social Fund (ESF):

- The ERDF is mainly used for 'hard' projects and infrastructure, like roads, bridges, railways – but it can, and should, be used for social and community facilities, neighbourhood services and community development.
- The ESF originated as a re-training fund. It is seen as the 'softer' fund, used for human resources, training and educational activities and social inclusion.

The ERDF is managed by the Commission's Directorate General for Regional Policy, DG REGIO, while the ESF is managed by the Directorate General for Employment, Social Affairs and Equal Opportunities, DG EMPL. Each has 'desk officers' allocated to designated groups of countries and these are important potential points of contact for social inclusion NGOs.

The following table gives the financial details:

FINANCIAL DETAILS OF CURRENT ROUND OF THE STRUCTURAL FUNDS, 2007-2013

Objective	ERDF	ESF	Cohesion Fund	Totals
Convergence	€152.6bn	€61.5bn	€69.6bn	€283.7bn
Competitiveness	€41.5bn	€13.5bn		€55bn
Cooperation	€8.8bn			€8.7bn
Total	€202.8bn	€75bn	€69.6bn	€347.4bn

Source: European Commission

As may be seen:

- The vast bulk of the funds goes to the poorer, convergence regions, over 81%, only 15% to the competitiveness regions;
- The regional fund, the ERDF, is the larger of the two funds, 73% of the combined ESF and ERDF totals;
- Cross-border cooperation is very small, only 2.5% of the total funds.

The structural funds have an important layer of allocations, called the 'earmarking' process. 'Earmarking' is the system whereby a high proportion of the funds should be allocated to supporting the revised Lisbon *Growth and Jobs* strategy. The Lisbon Strategy itemizes a series of headings which include growth, jobs, research, energy, the information society, transport and social inclusion, which (line 71) includes pathways to integration and re-entry to employment for disadvantaged people, combating discrimination in accessing and progressing the labour market and promoting acceptance of diversity in the workplace. In convergence areas, 60% of the structural funds must be earmarked to support the Lisbon Strategy, 75% in the competitiveness areas. Each year, the member states must report on the contribution of the structural funds to the achievement of the Lisbon Strategy. They will make concise reports to the Commission in 2009 and 2012, which will form the basis of two Commission strategic reports (2010, 2013). Earmarking is obligatory in the old 15 member states. It is an indicative tool rather than a legal requirement, but is expected to be given priority by all states. The structural funds are expected to work in conjunction with the Lisbon Strategy (at national level, the National Reform Programme) and the European Union's social inclusion strategy (at national level, the National Action Plans for Social Inclusion - NAPSIncl).

For 2007-2013, the funds operate according to a series of plans and guidance documents:

- Community Strategic Guidelines (CSGs), adopted by the European institutions in 2006;<sup>1</sup>
- The legal regulations governing the structural funds, adopted by the European institutions in 2006;<sup>2</sup>
- In each country, a National Strategic Reference Framework (NSRF) prepared by the national authority responsible for the structural funds, normally the Ministry for Finance;
- Below that, Operational Programmes (OPs). An OP may cover a region or a theme of activities across a series of regions or a country. These describe the individual priorities, axes, measures and sub-measures. All told, there are 466 OPs;
- Below them, in some cases, Implementation Plans (IPs). In some countries, other terminology is used, such as action plans.

Some countries may have a National Development Plan (NDP), but are not obliged to do so. In some countries, this is a plan for structural funds spending, whereas in others it has no connection to the structural funds (e.g. Ireland).

➤ For social inclusion NGOs, it is essential to obtain the key documents governing the structural funds: guidelines, regulations, NSRFs, OPs IPs and NDPs. They are an essential starting point and can normally be obtained from the European Commission and/or from the national or regional governments, often the Ministry for Finance, but also Ministries responsible for the economy, employment or social affairs. In the Commission, the Directorate General with overall responsibility for the structural funds is DG REGIO. The most efficient way to obtain the guidelines and regulations is from the DG REGIO website:

1. Click on the general European Union portal: <http://europa.eu>
2. Choose your **language**
3. You will be offered 'Activities', 'Institutions' etc. Go to '**Institutions**'
4. Go to '**Commission**'
5. Go to '**Regional Affairs**' (DG REGIO) or '**Employment, Social Affairs and Equal Opportunities**' (DG EMPL), as appropriate.
6. The top page of DG REGIO has **several sections on the structural funds**, while DG EMPL has a **section for the European Social Fund**.

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1 Council decision of 6<sup>th</sup> October 2006, 2006/72/EC, Official Journal of the European Union, L 291/11.

2 The general regulation is Council regulation EC 1083/2006, Official Journal of the European Union, 31.7.2006, L 210/25. The regulation for the European Social Fund is EC 1081/2006, Official Journal of the European Union, 31.7.2006, L 210/12. The regulation for the European Regional Development Fund is EC 1080/2006, Official Journal of the European Union, 31.7.2006, L 210/1.

The regulations are technical, but are not as difficult to read as one might expect. NGOs are not in a good position to argue about the structural funds with their governments or managing authorities without some familiarity with the regulations. A good knowledge will give NGOs a negotiating edge.

➤ Details of the officials in the European Commission are available from each Directorate General website, which publishes an organigram of all the units and personnel. (also available in the *Official Directory of the European Union*, [www.bookshop.europa.eu](http://www.bookshop.europa.eu) (hardback)).

The Commission also has offices in each member state, which can also help with information but which may refer you to the website. Commission websites:

> For the ESF,

[http://ec.europa.eu/employment\\_social/esf](http://ec.europa.eu/employment_social/esf)

> For the ERDF,

[http://ec.europa.eu/regional\\_policy/index\\_en.htm](http://ec.europa.eu/regional_policy/index_en.htm)

## THE PARTNERSHIP PRINCIPLE

One of the most important aspects of the 2007-2013 round (and its predecessors) is the partnership principle. This was possibly the most controversial issue in the preparation of the structural funds regulations, some governments being slow to recognize the role of NGOs at all. But in the end, §11 of the general regulation stated that each member state shall organize, *where appropriate and in accordance with current national rules and practices, a partnership with authorities and such bodies as:*

- *Competent regional, local, urban and other public authorities;*
- *Economic and social partners;*
- *Any other appropriate body representing civil society, environmental partners, non-governmental organizations and bodies responsible for promoting equality between men and women.*
- *Each member state shall designate the most representative partners at national, regional and local level and in the economic and social or other spheres (hereinafter referred to as partners) in accordance with national rules and practices, taking account of the need to promote equality between men and women and sustainable development through the integration of environmental protection and improvement requirements. [...]*
- *The partnership shall cover preparation, implementation, monitoring and evaluation of operational programmes. Member states shall involve, where appropriate, each of the appropriate partners and particularly the regions in the different stages of programming stages within the time limit set for each stage*

while the ESF regulation (§5) states that:

- *The member states shall ensure the involvement of the social partners and adequate consultation and participation of other stakeholders, at the appropriate territorial level, in the preparation, implementation and monitoring of ESF support.*

This means that social inclusion NGOs, like NGOs in other key areas of structural funds policy (e.g. environment) *should* be involved in the design and delivery of the structural funds, especially their operating institutions and methods (e.g. monitoring committees, evaluation, indicators). Some governments have been more enlightened in observing the partnership principle than others. In Britain, NGOs are concerned that an enlightened partnership based on a number of actors, especially civil society, is giving way to one in which structural funds are delivered by large companies through a market model. §11 has presented a significant challenge to NGOs to persuade the national authorities to make them active partners, whether being in the consultation process or being allocated seats on the monitoring committees. Participating in partnership requires NGOs to be effective and sophisticated advocates.

The Commission has from time to time asked for occasional reports on the quality of the partnership process in the member states. These reports have been weak, lacking analysis in their approach and uncritical in their conclusions, with social inclusion NGOs rarely asked for their views.

A useful approach for NGOs in general and social inclusion NGOs in particular is to set down *minimum standards for partnership* – exactly what is expected of government. These minimum standards should cover:

- How government should consult with social inclusion NGOs;
- Means of ensuring that consultation on structural funds design is *broad* and *deep*, covering small and large organizations, new groups as well as well established ones, geographical areas, distinct target groups; uses a multiplicity of methods, traditional to electronic; and that there is a consultation report at the end;
- How social NGOs should be selected for membership of the monitoring committees and consultative groups;
- Systems for reporting back, transparency and sustained, structured, regular dialogue between government, managing authorities and NGOs.

➤ For social inclusion NGOs, it is important to obtain a level of partnership that respects the general regulation's §11 and §5 of the ESF regulation, which are law. They should make an assessment of the quality and nature of that partnership. Where national governments do not observe the requirements, it is possible to make a formal complaint to the Commission that European law is not being observed, which the Commission is legally bound to investigate. The procedure is to make a formal complaint in writing to the head of the Commission representation in the country concerned, asking for a formal investigation of the alleged breach of regulation.

## CHECKLIST FOR SOCIAL INCLUSION NGOs

- Do you have the key structural funds documents listed here? Do you have a picture of how the structural funds operate?
- Do you know and are you in contact with the relevant national and regional authorities? Do you have regular contact with the desk officers responsible for your country (ESF, ERDF)? Do you brief your Members of the European Parliament, the Economic and Social Committee and the Committee of the Regions and ask them to take up issues for you?
- Are you satisfied with the quality and standard of partnership in your country? Have you provided an analysis of the quality of partnership, sent it to the Commission and followed up the issues? If the quality of the partnership falls below the legal requirements, have you set in train a formal complaint?





Fliessestrich, Luxembourg: Work in progress (vocational training)  
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Freedom Arts project - London Voluntary Sector Training Consortium,  
member of EAPN England

## CHAPTER 2

# INFLUENCING THE STRUCTURAL FUNDS

Social inclusion NGOs have attempted, ever since 1988, to influence the design of the structural funds to make them more effective instruments for social inclusion. Here we look at how they tried to do so in advance of the 2007-2013 programming period.

## AN INTRODUCTION TO INFLUENCING THE STRUCTURAL FUNDS

Social inclusion NGOs have considerable experience of observing and sometimes participating in structural funds operations to the point that they know what makes for good design features of structural funds. These are:

- A design that has social inclusion as an over-arching objective;
- Social inclusion as a cross-cutting or horizontal objective of *all* programmes (as should gender and the environment);
- A significant proportion of the funds (ESF and ERDF) devoted to social inclusion;
- The designation of disadvantaged groups who should be targeted by the structural funds (e.g. unemployed people, the Roma community, people with disabilities, ethnic minorities, refugees and asylum seekers, lone parents, early school leavers, disadvantaged urban or rural areas);
- Methods which ensure that structural funds actually reach these groups. Here, delivery through grass roots and street level NGOs is the best approach.

## NGOS INFLUENCING DESIGN

In the period of the introduction of the 2007-2013 round, social inclusion NGOs carried out a number of campaigns to influence the design of the funds.

## EXAMPLES OF NGOS INFLUENCING THE DESIGN OF THE STRUCTURAL FUNDS

In Estonia, the NSRF and operational programmes were prepared by working groups which included NGO representatives. Significant numbers of NGOs were involved in these working groups, organized by the Ministries of Education & Research (24 NGOs), Social Affairs (29), Culture (6), Environment (5), Economic Affairs & Communications (30), Agriculture (32) and Interior (20). NGOs involved in the working groups convened by the Ministry of Social Affairs included organizations representing people with disabilities, older people, women, integration and care services, as well as the network of non-profit organizations. The list of NGO participants was published.

In Latvia, public hearings were organized for the NSRF and the individual operational programmes, to which NGOs were invited to participate and 15 did so (e.g. women's organizations).

In Slovakia, NGOs were active participants in preparing the operational programmes for education, as well as research and development.

In Britain, social NGO regional networks funded by technical assistance promoted public consultation on the ESF and the government posted on its website the views of the London Voluntary Sector Training Consortium.

In Lower Saxony, Germany, social NGOs were active participants in the programme development body which prepared the operational programmes for the ESF and ERDF under the Ministry for the Economy. As a result, using §34 of the general regulations, it was possible to improve social infrastructure projects to complement the ESF interventions.

In Greece, NGOs attempted to influence the management of structural aid. The authorities 'clearly took on board the suggestions' and the European Commission expressed its pleasure at the outcome.

In Slovenia, the Ministry for Public Administration organized several consultation measures for the operational programme for human resource development. Social partners and NGOs participated in programme design and according to the ESF unit, their views were taken into account for the final version of the document.

### 👉 CASE STUDY: CHANGING THE NSRF DESIGN IN BULGARIA

When the original NSRF and structural funds programme was published in Bulgaria, there was almost no mention of the Roma community. Quickly, 47 Roma organizations came together to put forward proposals for a significant improvement. There were two national meetings of Roma NGOs and two presentations were made to the Ministry for Finance. The outcome was:

- An entire chapter, *The Roma minority*;
- Roma included as a specific target group of intervention, with a recognition that Roma needs were greater than those recognized in the census;
- Formal mainstreaming of the most acute issues facing the Roma community: education, health, social services, housing and information technology;
- The NSRF acknowledged the body of Roma policies already laid down in Bulgaria and further afield, such as the *Framework program for equal integration of Roma in Bulgarian society*, the *National Action Plan for the Decade of Roma Inclusion*, the *National program for improving the housing conditions of Roma*; and
- A statement of acknowledgement of the role of Roma NGOs.

The final NSRF noted the contribution of the Roma NGOs to the design and stated that 'in conformity with the partnership principle the comments and recommendations have been reviewed and about 90% of them have been accepted and integrated in the programme'. The organizations described this campaign as 'one of their most successful ever'.

### ☞ CASE STUDY: INFLUENCING NSRF, NDP DESIGN IN THE CZECH REPUBLIC

In the Czech Republic, NGOs organized a campaign *Engagement of not-for-profit NGOs in preparation of the National Development Plan and National Strategic Reference Framework, 2007-2013*. The purpose was to collect together the observations, views and proposals of NGOs, based on their wider consultation with citizens, right down to village level, in six regions of the Czech Republic. It was funded by the government's Information Resource Department on European Issues. The methods used were round tables, public discussions, conferences, e-conferences and the circulation of the draft NDP and NSRF, with summaries. The purpose was not only to improve the NDP and NSRF but to establish a transparent and open environment for democratic debate. The outcome was that the NDP and NSRF were strengthened in a number of areas:

- Recognition of unpaid work;
- Additional help for applicants with few capital assets;
- Advance payments;
- The social economy;
- Improved project opportunities for NGOs.

### ☞ CASE STUDY: INFLUENCING THE HEALTH PROGRAMME DESIGN IN BULGARIA

Bulgarian Roma organizations were quite unhappy with measure 5.3 *Employability through better health* of the 2007-2013 operational programme for Human Resources Development, especially the sub-measures for health information and early diagnosis of cancer. The measures provided for projects to be delivered only by government departments (in this case the Ministry for Health) and there was no consultation with the Roma community. Accordingly, the Amalipe Association and another NGO, *Stara Zagora (World without Borders)* made the case for broadening the measure to involve not just the Ministry, but agencies responsible for an equal partnership with the Roma community. They brought the matter to the monitoring committee, which endorsed their view. This was followed by a meeting with the deputy Labour Affairs Minister, who gave them assurances that a partnership approach would be followed. The scheme was revised, setting down the principle of 'joint activities for vulnerable groups', such as the Roma community and that partnership was 'guaranteed'.

## ☞ CASE STUDY: MOBILIZING NGOS TO INFLUENCE THE STRUCTURAL FUNDS IN PORTUGAL

From May 2006 on, EAPN Portugal took a series of initiatives to inform social NGOs about the 2007-2013 structural funds. These included distribution of the EAPN structural funds manual, a position paper on the new round and three workshops in Lisbon, Porto and Coimbra. The workshops aimed to promote both debate on the role of social inclusion in the funds and participation by NGOs in the design of the funds. An edition of EAPN Portugal's newsletter *Rediteia* was dedicated to the structural funds, providing information and articles. The aim of these efforts was to disseminate information, maintain the lobbying capacity of social NGOs (not always well developed in Portugal) and create conditions for social NGOs to participate both in negotiations and the subsequent stages of the structural funds.

## CHECKLIST FOR SOCIAL INCLUSION NGOS

- Have you tried to influence the design of the current round the structural funds? What were the outcomes? What can be learned from the experience?



Let's Braid Projects Together – European youth project, Bacau, Romania.  
From the Renasis network

### CHAPTER 3

# NGOS USING FUNDS FOR SOCIAL INCLUSION

Besides influencing the design of the structural funds, many NGOs have attempted to obtain funding so as to directly participate in the delivery of programmes and projects. First, the chapter looks at why the delivery system matters. Second, there are examples of social inclusion projects delivered by NGOs in the mainstream structural funds. Then the chapter focuses on other ways in which social inclusion NGOs can access the structural funds: global grants, capacity building and technical assistance.

## INTRODUCTION: HOW PROJECTS ARE DELIVERED DOES MATTER

EAPN does not argue that only NGOs should deliver the structural funds, or that governments are necessarily poor at delivering structural funds. But EAPN does argue that social inclusion NGOs are often much closer to the target groups of the structural funds, trusted by them, have experience in delivering projects that work well and use proven methods that produce positive outcomes and results (e.g. community development). In Spain, for example, evaluations of the structural funds have clearly shown that projects delivered by NGOs have successfully reached out to large numbers of socially excluded people (e.g. immigrant and ethnic minority communities), significantly improved their skills and qualifications and led to an improved quality of life.

Remarkably, the structural funds regulations have little to say about *who* should deliver the structural funds, apart from the fact that it is the responsibility of the member state and its managing authorities, which are defined as public or private bodies at national, regional or local levels designated by the member state. The regulations give a wide scope as to the social inclusion measures that may be funded and many of the actions proposed by the European Social Fund in particular lend themselves to delivery by social inclusion NGOs. The ESF regulation states:

*§5.4 The managing authority of each operational programme shall encourage adequate participation and access of non-governmental organizations to the funded activities, notably in the domains of social inclusion, gender equality and equal opportunities.*

We should therefore look for a significant part of the structural funds to be NGO-friendly. In particular, they should use systems which encourage and promote NGO participation, such as technical assistance and global grants. Looking in more detail, §3 of the ESF regulation makes provision for measures for:

*(c) Reinforcing the social inclusion of disadvantaged people with a view to their sustainable integration in employment and combating all forms of discrimination in the labour market, in particular by promoting:*

- (i) pathways to integration and reentry into employment for disadvantaged people, such as people experiencing social exclusion, early school leavers, minorities, people with disabilities and people providing care for dependant persons, through employability measures, including in the field of the social economy, community and care services that improve employment opportunities;
- (ii) acceptance of diversity in the workplace and the combating of discrimination in accessing and progressing in the labour market, including through awareness-raising, the involvement of local communities and enterprises and the promotion of local employment initiatives.

This suggests projects in the areas of training, education, social services and support for the social economy. There is also more scope than is generally realised for funding social inclusion measures through the European Regional Development Fund. The ERDF regulation includes in convergence areas neighbourhood services (§4.3), health, social and local infrastructure (§4.11) and in urban programmes, community development (§8). Despite these openings in the regulations, most social NGOs still find the ERDF impenetrable.

Many of the problems experienced by NGOs in previous structural funds rounds have recurred in this period 2007-2013, such as requirements for co-funding, guarantees, annual rather than multi-annual projects and lack of transparency. A particular problem in the 2007-2013 round is that there seems to be, in many countries, much less room for smaller projects, with the member states favouring ever larger projects, generally run by government (a process called 'massification').

Influencing and accessing the structural funds requires social inclusion NGOs to invest time and energy in getting to know, befriending and influencing their managing authorities and building working relationships with the officials concerned (> Chapter 4).

➤ The Commission has published a *Sourcebook on sound planning of ESF programmes*, available both from the DG EMPL site and as a printed publication. It is a management tool for social inclusion NGOs contemplating or carrying out ESF projects.

➤ Some countries provide useful guides and manuals on how to apply for structural funds and execute projects. An example is Luxembourg, where the ESF management section of the Ministry of Labour published a *Guide de l'Utilisateur* (user's guide). Bulgaria provides a *General procedure manual for structural funds management* ([www.eufunds.bg](http://www.eufunds.bg)) as well as a substantial and informative website on the structural funds.

## SOCIAL INCLUSION PROJECTS DELIVERED BY NGOS

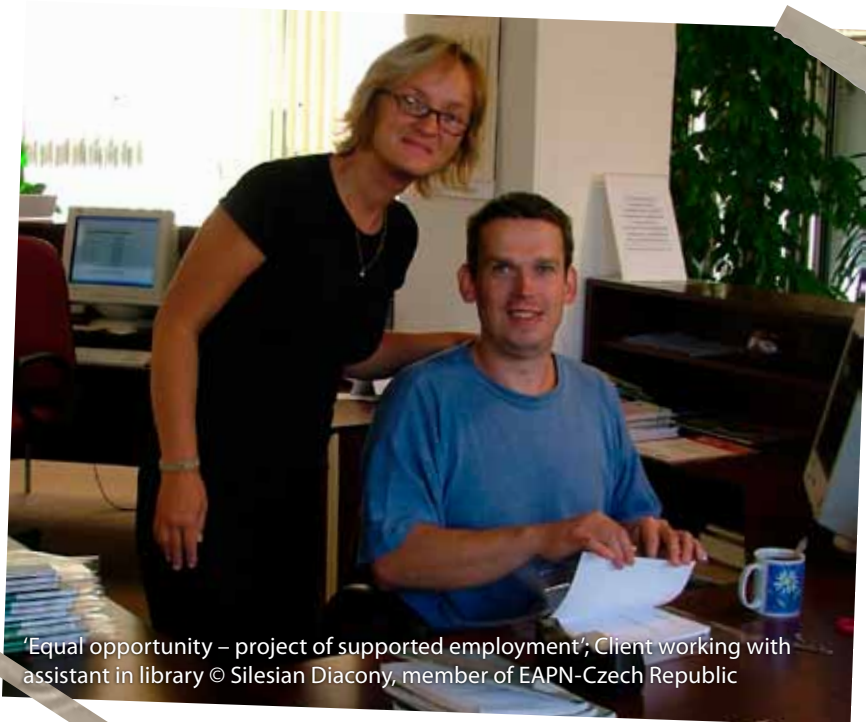
Operational programmes combine measures delivered by government departments or Ministries, government agencies, contracted out groups and NGOs. Operational programmes can sometimes be quite vague as to who will deliver programmes, how and when. There can be a wide contrast between some measures, which are

subsumed into the day-to-day spending of government departments and Ministries and, at the other extreme, highly visible public calls for projects and open competitions. Accordingly, there is a substantial challenge for social inclusion NGOs to find out what measures are available by making enquiries with the managing authorities. In extreme cases, where it appears that funds are not being used properly, or where it is not possible to get information at all, social inclusion NGOs should consider a formal complaint to the Commission and/or to the European Ombudsman.

### EXAMPLES OF NGOS ACCESSING THE STRUCTURAL FUNDS

In Portugal, EAPN Portugal proposed projects for the ESF priority axis 3 *Professional management and further training* and priority axis 6 *Citizenship, inclusion and social development* in the €8.8bn *Human potential* operational programme. Under axis 3, three applications worth €1.3m were approved for a training and action programme in the social economy, called QUAL-IS and a fourth called SIQ. Here, 89 organizations are involved in training NGOs to improve the quality of their services, with ten new staff hired for 2008-9. The axis 6 project, developed with Santarém, provides training for disadvantaged people without qualifications and on minimum income.

In the Czech Republic, individual members of the European Anti Poverty Network are carrying out projects in the 2007-2013 round in the areas of improving social services, further education and training for social service providers and services promoting the more active participation of excluded people in the labour market.



'Equal opportunity – project of supported employment'; Client working with assistant in library © Silesian Diacony, member of EAPN-Czech Republic



In Spain, there are 19 regional operational programmes and three multi-regional programmes (adaptability and employment; the struggle against discrimination; and technical assistance, transnational and interregional cooperation). Here, NGOs deliver projects in the struggle against discrimination.

In Germany, welfare organizations negotiated a €40m ESF programme for (1) the social economy and (2) the social integration of people excluded from the labour market, with a steering office in the Federal Association of Voluntary Welfare Agencies in Berlin. In Lower Saxony, Germany, there is a €91.3m programme to support disadvantaged people and for labour market integration. Also in Lower Saxony, the six large German welfare NGOs, working as a European office for Voluntary Welfare Agencies, obtained a budget to develop and improve model projects in the area of social inclusion (>Technical assistance). 'The welfare organizations have access to particularly disadvantaged people and know better than anyone else how to support these people in approaching the labour market', they say.

In Flanders, the Flemish Network against Poverty made a report on the activation of people experiencing poverty and prepared an ESF project that involves people experiencing poverty.

In Slovenia, there are two social inclusion measures which fund NGOs within the operational programme for human resource development. These are 4.1 *Equal opportunities in the labour market and reinforcing social inclusion* and 4.3 *Increased employability of vulnerable groups in the field of culture and support for their social inclusion*, with an allocation of €58.25m. 4.1 will target the long-term unemployed, over 50s unemployed, youth at risk, first-time job seekers, ex-convicts, drug addicts, migrants, people with disabilities, members of ethnic minority groups and the Roma community, through both projects and campaigns against discrimination. Typical projects are expected to include social entrepreneurship, care services for children or older people, job training and job creation.

In Britain, there are six ESF and 16 ERDF operational programmes, with social NGOs engaged at all levels and support for social NGO regional networks specifically mentioned in the NSRF. In England, the ESF priority *Extending employment opportunities* has encouraged street-level NGOs to target and work with a wide range of disadvantaged groups.

➤ See *European Social Fund in action, 2000-6: success stories*. European Commission, DG EMPL, 2005.

### ☞ CASE STUDY: OPERATIONAL PROGRAMME AGAINST DISCRIMINATION IN SPAIN

In Spain, there is an operational programme for the struggle against discrimination for 2007-2013, which takes the place of a successful programme in the 2000-6 round. The old programme was large in scale, with as many as 192,000 participants from 600 different organizations working with vulnerable women, ethnic minorities, Roma, people with disabilities and others living in situations of exclusion.

The new programme is managed altogether by ten intermediary bodies. Five are national public administrative bodies and five are NGOs working in the fields of employability and social inclusion: *Cáritas Española*, *Cruz Roja Española* (Red Cross), *Fundación Luis Vives*, *Fundación ONCE* and *Fundación Secretariado Gitano* (for Roma people). The main objective is to promote social cohesion in particular by supporting the inclusion of disadvantaged groups and to fight any kind of discrimination based, among others, on ethnic origin.

The secret to the success of the new programme was the vigorous way in which the old programme was promoted and the ways in which NGOs coordinated requests to the public authorities in Spain for financial support for a new programme. The old programme was promoted through websites, extensive publications and persuading the European Commission to endorse the programme as an example of good practice. It was publicized in Commission guides to ESF good practice and was made the subject of an international peer review, with a seminar held in Cordoba in 2007. As a result, the programme had exceptionally high visibility and, as the saying goes, 'you cannot argue with success'.

### ☞ CASE STUDY: ACCESSING STRUCTURAL FUNDS FOR EDUCATION IN BULGARIA

When the educational measure in the Human Resources Development operational programme was introduced in Bulgaria (the €12.7m measure *Creating a favourable multicultural environment*), local authorities were listed as the only possible delivery bodies of the funds. The Roma representative on the monitoring committee raised this at the next monitoring committee meeting, which endorsed his view that other organizations, like schools and NGOs, should be eligible to apply. When projects were finally approved, NGOs obtained the largest share of projects, 27, in the call for proposals for the Ministry for Education & Science, with other projects going to schools and local authorities. NGOs were also successful in winning 83 out of 256 projects in the measure *Make school attractive for young people*, or 34% of the funds, second only to schools.

### GLOBAL GRANTS

Global grants were introduced in the reformed structural funds to enable programmes to be delivered more directly to target groups. Provision is made for them in the general regulations:

*§§42-3 The member state or the managing authority may entrust the management and operation of a part of an operational programme to one or more intermediate bodies, designated by the member states or the managing authority, including local authorities, regional development bodies, or non-governmental organizations.*

The global grant approach has considerable potential to bring the structural funds directly to groups and communities experiencing poverty. Intermediary bodies which have an understanding of social exclusion can be ideally placed to deliver structural funds, often in the form of small grants, to groups working in the area of community development and make a real impact at the local level. The global grant system has

been widely and successfully used in Britain for many years, where it has an easily understood and accessible application procedure, 100% up-front financing, light reporting and monitoring requirements as well as direct support for applicants and grant recipients. In Spain, the operational programme against discrimination in 2000-6 was delivered through a global grant managed by the Fundación Luis Vives, possibly the largest global grant allocated at the time (> *Case study, above*).

Despite their known benefits, there appears to be disappointingly little use of global grants in the 2007-2013 round and the Commission applied no visible pressure on the member states to do so. The decision to approve a global grant is at the discretion of the member state. Now that the operational programmes are under way, it is difficult to see many programmes adapted for global grants at this stage.

### EXAMPLES OF GLOBAL GRANTS

In Britain, there are global grants for micro-projects under regional programmes called *Community grants*. Reporting and payment conditions are much stricter than before and more like the main ESF. For reports and studies on the global grant experience in Britain, see London Voluntary Services Training Consortium: *The London ESF story through third sector eyes*. [www.lvstc.org.uk](http://www.lvstc.org.uk).

In France, two regional members of FNARS, a leading NGO in the area of homelessness, are intermediary organizations delivering micro-projects for associations (Centre and Ile-de-France). The transnational strand of the ESF is administered by an intermediary organization, Racine.

The Hungarian EAPN network made a formal proposal and presentation to the managing authority for a system of global grants.

Portugal does not yet have global grants, but decree 5312/2007 will make such grants possible in the future. Non-governmental organizations are specified as possible intermediary bodies.

### CAPACITY BUILDING AND TECHNICAL ASSISTANCE

Apart from applying for and delivering projects through the main operational programmes and global grants (the main routes), there are two other avenues whereby NGOs may obtain structural funds: capacity building and technical assistance. Capacity building means a programme or measure to build up, over a period of time, the ability of NGOs to deliver and develop their services through improved knowledge and skills. Technical assistance is a fund to support structural funds operations. Although governments use technical assistance to fund the routine administration of the structural funds, it is also available for focused tasks such as events, activities and support for organizations to carry out structural funds operations more effectively.

Here are some more details on each. First, the structural funds make provision for funding for what is called 'supporting administrative capacity'. In the convergence areas, the ESF regulation states that there is financial support for:

*§3.2.b Strengthening institutional capacity and the efficiency of [...] the social partners and non-governmental organizations*

including, in summary,

*Capacity-building in the delivery of policies and programmes in the relevant fields, especially through continuous managerial and staff training and specific support to key services and socio-economic actors including social and environmental partners, relevant non-governmental organizations and representative professional associations.*

This can be done through dedicated programmes and measures, with a real potential for the ESF to contribute to strengthening NGO capacity. In Hungary, for example, in the Social renewal operational programme, there is a measure *5.5.1 Development of local communities and civil society*. In Slovenia, the operational programme for human resources development has a measure *5.3 Promotion of NGO development, civil and social dialogue*, which aims to strengthen NGO capacities, organizations, networks and focal points. A budget of €13.4m was allocated and eight projects were supported in the first round, mainly for information and advice services. Evidence of this provision being used more widely is unfortunately not available.

Second, structural funds programmes make provision for technical assistance. The general regulation (§46) specifies that technical assistance may be available for the preparation, management, monitoring, evaluation, information and control activities of operational programmes together with activities to reinforce the administrative capacity for implementing the funds. Publicity, evaluation and monitoring committee meetings, for example, are funded from technical assistance. As is the case with the issue of who delivers the funds, there is no statement that this should be limited only to government, so technical assistance is in principle automatically open to NGOs for these purposes, including helping them better access and manage structural funds.

For 2007-2013, member states may spend up to 4% of each operational programme on technical assistance for the convergence and competitiveness objectives; and up to 6% for the cooperation objective. The Community Strategic Guidelines lay emphasis on the importance of good governance, and state that member states should ensure increased efficiency and transparency and should consider actions to enhance capacity building, in such areas as social audit procedures, open government principles and support to key services and socio-economic actors.

⊗ In practice, most governments keep technical assistance for themselves. Some programme managers (e.g. Ireland) have even take the extreme view of ruling out technical assistance to NGOs, apparently under any circumstances. An additional problem is that it can be very difficult to find out where technical assistance is actually spent or even who takes those decisions.

Despite that, there are examples from other countries of NGOs successfully obtaining technical assistance to: participate in structural fund activities so as to deliver programmes; for those which are not actually delivering the funds yet, to undertake information work about the structural funds; and as well to carry out analysis and evaluation of how the funds are used.

## EXAMPLES OF CAPACITY BUILDING AND TECHNICAL ASSISTANCE

In Spain, technical assistance for NGOs is provided through two intermediary bodies, the Women's Institute, a governmental body and an NGO, the Fundación Secretariado Gitano (for Roma) under the heading *Technical assistance, interregional and transnational cooperation*. The Fundación Secretariado Gitano provides technical assistance to run the European network on social inclusion and Roma (> Chapter 7).

In Britain, managing authorities have provided national and regional technical assistance for social NGOs through the ESF and ERDF continuously since 1993 (e.g. through the London Voluntary Sector Training Consortium (LVSTC)). Recently, LVSTC led a two-year partnership with eight other organizations to deliver a regional capacity-building project to support 3,100 street-level micro-projects. This has now been set back by the European Commission which has intervened to stop the levy system which helps delivery agencies raise matching funding for technical assistance.

In Lower Saxony, Germany, the country's six main welfare organizations (Diakonie, Caritas, Rote Kreuz, Arbeiterwohlfahrt, Parität, Jüdische Wohlfahrt) received technical assistance for what is called the European Office of Voluntary Welfare Agencies. The European office provides information, suggestions for projects, support in developing funding ideas, assistance in developing applications, advice on matching funding, training, workshops, advice and ideas for projects as well as networking with business partners. Its slogan is 'Let's put our heads together to figure out how your ideas can be transformed into projects eligible for funding'. At national level, there is an office to develop and administer projects in the programme *Improving the social economy*.

➤ European Office of Voluntary Welfare Agencies, Heiligengeiststraße 28, Lüneburg 21355, Germany, tel. 49 4131 221 4990, fax 49 4131 221 4991, [europabuero-lueneburg@lag-fw-nds.de](mailto:europabuero-lueneburg@lag-fw-nds.de).

In Portugal, the operational programme for technical assistance outlined a range of activities where non-governmental organizations could play an active role, such as studies and innovative actions. Technical assistance is available for studies to deepen knowledge in the areas of policy and interventions, both national and ESF, in the European Employment Strategy and the National Employment Plan; in the European Social Inclusion Strategy and the National Programme on Inclusion; in gender mainstreaming and the implementation of the National Plan for Equality and the National Plan for the Integration of People with Disabilities. There is tech-



nical assistance for studies and assessments related to ESF interventions, for example in transversal or thematic areas such as equal opportunities, transnationality and innovation. Technical assistance is available for innovative projects in such areas as education, training and employment policies, disadvantaged groups.

In Slovenia, the Ministry for Public Administration, with the Ministry for Labour, Family and Social Affairs have provided technical assistance for NGOs for project preparation – but ‘practice has shown’ that such assistance would also be valuable to assist NGOs in implementation.

### ☞ CASE STUDY: TECHNICAL ASSISTANCE FOR ACCESSING THE ESF IN FRANCE

For the 2007-2013 programming period, several networks came together in France to promote an improved rate of application and take-up of the social economy programmes in the ESF. They obtained ESF technical assistance funding from the Directorate for employment and professional training (in French, DGEFP) to run this programme for the period January 2008 to December 2010. In the past, proposals by social inclusion NGOs had experienced real difficulties in conceptualizing and presenting good quality projects.

The campaign was led by FNARS, a leading NGO in the area of homelessness, with the umbrella body for the provision of health and social services, UNIOPSS, both active members of EAPN France. Using a professional intermediary body familiar with the social economy, Avise, the first proposals for funding in these programmes were made

to DGEFP as far back as 2004. Avise outlined the ways in which social inclusion NGOs could build their capacity and present more winning projects, 'making them more professional' through such tools as good proposal preparation, project management, technical instruction and improved methodologies. Training was complemented by a practical guide, hotline, internet site, a network of resource experts, seminars, studies showing the value of ESF-funded projects, and examples of good practice of social economy projects. The practical guide *Gérer et financer un projet avec l'appui du fonds social européen* is a 93-page illustrated guide with sections *Developing an idea, From idea to project, Internal arrangements, Choosing the programme, Completing the proposal, Contracts, Monitoring, Finance, Balance sheet* and *Post-project phase*. There is background material, a CD-ROM and readers are encouraged to use the hotline.

Since then, 1,000 guides have been distributed and 542 people trained. FNARS and UNIOPSS organized an information day for 155 participants in October 2007 to discuss the opportunities for local social inclusion NGOs to participate in the new ESF, including the budget lines that presented the most opportunities. The outcome of this project and the campaigns pursued around it:

- Recognition of NGOs as a partner in the structural funds;
- Maintenance of a budget line for NGOs, albeit at a lower level than 2000-6 and not operating in two regions;
- NGOs eligible for most of the measures in the ESF operational programmes;
- ESF funding to promote the participation of social inclusion NGOs in the structural funds through a guide, management tools, hotline, regional network of experts and training.

### ☞ CASE STUDY: TECHNICAL ASSISTANCE FOR ACCESSING THE STRUCTURAL FUNDS IN MALTA

The Malta Resource Centre, which is the secretariat for EAPN Malta, was conscious of the interest in the structural funds among social inclusion NGOs in the Maltese islands, but also aware of their lack of capacity to propose projects or handle such funds. The centre applied directly to the managing authority for technical assistance for a training programme and obtained 75% funding from the technical assistance strand of the European Social Fund in Malta and 25% independently from the Civil Society Fund.

The training programme called *Structural funds training and technical assistance programme for NGOs and civil society organizations* involved an information seminar (June 2007) followed by an intensive training programme (August – October). There was a day-long workshop every week, adding up to a total of 54 hours of instruction, given by private sector training experts in project management and accounting. The topics covered were: project identification and planning, financial management regulations, public procurement, the structural funds manual of procedures, project management, monitoring and control, publicity requirements and record keeping for audits, the ESF in practice (with speakers from Spain, Britain and Italy) and other funds.

Nineteen participants completed the course and were awarded certification. Course documentation was also made available on-line. The course was evaluated and recommendations made, with a published end-of-project report *Project description and recommendations*. The Malta Resource Centre was hopeful that as a result there would be at least two successful projects in the new round. [www.mrc.org.mt](http://www.mrc.org.mt)



Trying to find out who is responsible for technical assistance can be difficult, especially for governments which do not want anyone else to use the facility. An exception is Luxembourg, where the government's user's guide (*Guide de l'Utilisateur*) lists the persons responsible for technical assistance at the very start, with their e-mails.

### CHECKLIST FOR SOCIAL INCLUSION NGOS

- Can you find out precisely what parts of the structural funds, operational programmes, priorities, axes, measures and sub-measures you will be able to access?
- Do you have a strategy for doing so? If parts of the structural funds are closed off from NGOs, what strategies do you have to change this and make them open?
- How well prepared are social inclusion NGOs to apply and respond to calls for proposals? Have you built up their capacity so that they have a real chance of managing good projects, like has been done in Malta and France?
- Have you found out the plans for technical assistance for 2007-2013? Have you found out how it has been spent already? Have you applied for and got technical assistance or support for capacity building? If capacity building measures and technical assistance appear to be closed off from social inclusion NGOs, what plans do you have to prise them open?
- When will you begin a campaign for global grants, technical assistance and capacity building for 2014-2020?



## CHAPTER 4

## A CRITICAL VOICE

Apart from delivering structural funds projects, NGOs have a crucial role to play in ensuring that funds are delivered in a way that contributes to social inclusion. Becoming a critical voice and engaging with the key actors are essential to make this happen. First, this chapter provides an overview of who NGOs should engage with. Then it looks at how to form a critical view of the funds.

## THE KEY ACTORS

European Union cohesion policy has created a world of people involved in the structural funds, here-on-in called 'the actors'. NGOs wishing to influence cohesion policy must identify and address this world of structural funds actors. These are the people who social inclusion NGOs will wish to send their information and analysis (e.g. through a dedicated mailing list) but also with whom they need to build a working relationship so as to influence and persuade them.

The key actor in each member state is the managing authority, which is the body designated by the government to manage the structural funds as a whole and then the individual operational programmes. The managing authority is responsible for ensuring the roll out of projects, selection, monitoring, evaluation, reporting, information and publicity. Managing authorities may delegate some tasks to intermediary bodies, for example government agencies, or even bodies outside government (e.g. with global grants). An important function of the managing authority is to put in place a system of monitoring (> Chapter 6).

The structural funds operate according to a system of shared management, shared with the European Commission. Despite a shift of power from Brussels to the mem-



Public action, Linz, Austria 2006 (c) lynn@art / Armutskonferenz

ber state (> Chapter 1), the Commission still has a role in discussing and adjusting member state priorities, monitoring implementation and implementing the overall budget. In practice, this happens through the system of 'desk officers', with a desk officer responsible for a cluster of countries in each of the two Commission Directorates responsible for the structural funds, DG REGIO and DG EMPL. The desk officer is responsible for following developments in each country in the group (often 3 or 4 member states), checking on the implementation of guidelines and regulations, being aware of problematic issues and ensuring roll out of the funds progresses in an orderly manner, which is often done through bilateral meetings with member state managing authorities.

These are two key elements, but there is a broader world of actors around the structural funds (see table). This is the environment in which social inclusion NGOs must work and the people whom they must persuade.

<b>Structural Funds Actors</b>		
<b>Media</b> <b>Public administration</b> <b>Academic/institutes/                      research/think tanks</b> <b>Commentators</b>	<b>European Commission</b>	
	<b>DG EMPL</b> <b>Desk officers</b>	<b>DG REGIO</b> <b>Desk officers</b>
<b>Governments</b> <b>Managing authorities</b>		
<b>National monitoring committee members</b> <b>Mainly Ministries, government agencies, mainstream monitoring bodies,                      social partners</b>		
<b>Operational programmes, measures, projects</b> <b>Delivery bodies and agencies</b>		
<b>Programme monitoring com-                      mittee members</b>  <b>Social partners</b>  <b>Social inclusion NGOs</b>	<b>Other NGOs</b>  <b>MEPs</b>	

## FORMING A CRITICAL VIEW

These are the formal actors in the world of the structural funds - but how do we form a critical analysis of the funds themselves? The European Commission has a formidable publicity machine, here devoted to publicizing the funds and their benefits. Likewise, national governments will, for political, electoral or other reasons, advertise the benefits of the funds so that we may be aware of the wisdom of their investments. Between them, they tend to obscure the key question as to whether the funds actually promote social inclusion or not.

Social inclusion is a formal objective of the structural funds, stated in the Community Strategic Guidelines and the regulations and is a particular objective of the European Social Fund. The language is there, but does that actually mean that the structural funds *are* socially inclusive? Trying to assess whether the structural funds are socially inclusive is not as easy as it seems, but here is a set of questions to start with when we examine the funds in each country:

- To what degree is social inclusion formally stated as an objective in the NSRF and the OPs? Is it *prominently* stated? Does the section in the document on 'context' give much attention to social inclusion? Does the section on social inclusion show a proper understanding of poverty and exclusion? To what degree was social inclusion taken into account during the consultative process? Is social inclusion stated as a cross-cutting objective (with gender, the environment)?
- How many operational programmes actually address social inclusion? Is it a theme found throughout all operational programmes? Can social inclusion be found in the 'harder' programmes (e.g. transport, industry, environment)?
- Who is *targeted* by the structural funds? Are they groups known to be socially excluded? Are important groups in poverty *not* targeted (e.g. children, older people, those perceived to be 'outside the workforce')?
- What is the proportion of the funds that goes to social inclusion? Can we assess this, programme by programme, priority by priority, axis by axis, measure by measure? Can we reach a figure for the proportion of the funds, overall, that is for social inclusion?

Perhaps the most useful guideline in analyzing the structural funds is to ask the question *Cui bono? Who benefits?* Going through the operational programmes line-by-line, who is likely to gain most from grants, training, infrastructure, projects and so on?

In some member states, social inclusion is strongly stated as a priority, in NSRFs, NDPs and in individual programmes. Some OPs make considerable efforts to target groups at high risk of social exclusion. In some countries, resources have clearly shown a shift of resources toward human resources, and, within human resources, to groups clearly identified as excluded.

## ☞ CASE STUDIES: ANALYZING THE STRUCTURAL FUNDS IN IRELAND AND HUNGARY

A number of NGOs have made a systematic analysis of the structural funds, such as Community Workers Cooperative in Ireland. These were published in the following reports:

*Whose plan? Community groups and the National Development Plan (1989)*

*The European structural funds – the challenge to address social exclusion (1992)*

*Equality and the structural funds (1995)*

*A socially inclusive national development plan? A critical commentary (2000)*

The principal finding of this analysis was that structural funds were quickly absorbed by the social, political and administrative élites of the country to reinforce their existing priorities and values. Some resources did go to the most disadvantaged and although these programmes were given high visibility, the actual amounts were comparatively small. For example, the main programme to tackle disadvantage (the high-profile operational programme for local, urban and regional development) was actually the smallest operational programme, with only 4% of the funds. In education, most funding went into the university and technical sectors, almost nothing into the disadvantaged sectors. In housing, most of the money went to helping new home-buyers and only a small proportion to the homeless or Travellers without suitable housing ('Roma'). In transport, most funding went to roads, with very little for buses on which poor people, older people and women disproportionately depended. Some programmes were open only to private co-funders able to present large amounts of co-funding, several millions, favouring those already advantaged. This was especially true in tourism programmes, which were not open to local operators in rural areas on low incomes. As a result, some structural funds actually led to more social exclusion, not less. These reports were not welcomed by government, but had the effect of broadening debate on the role of the structural funds and helped social inclusion NGOs to be much sharper analysts and interpreters of government policy. The proportion of funds that could be deemed 'social inclusive' did actually rise over the period of several funds, from 29% to 37%.

In Hungary, 17 NGOs concerned with social inclusion (including EAPN Hungary), community development, the environment and other issues came together to analyze and issue a critical commentary around the consultation process on the structural funds. The group was called NGOs for the Publicity of the National Development Plan (NPNDP), an informal action group. The outcome was published as *Monitoring report on the public consultation on the second National Development Plan in Hungary, 2004-8*, a critical account of how the NPNDP tried to influence the plan, the reactions of the political administrative system and a record the group's attempt to press for a broader vision of the meaning of consultation.

## MAKING A CRITICAL ANALYSIS

There are several ways in which social inclusion NGOs can make a critical analysis of the structural funds in their country. The key steps are to:

- Obtain the relevant documentation on the funds, especially operational programmes and implementation plans, previous evaluations, especially the *ex-ante*;
- See who else has made a critical analysis of the structural funds, for example experts in public administration, economists and social commentators. These groups are often under-estimated by social inclusion NGOs and some are very willing to help;
- Study the spending lines in the various measures, what money is going to who, the target groups, who the beneficiaries are likely to be (*Cui bono?*) and start working out the proportions. Look at what is *not* funded (e.g. social economy?);
- Look at the degree to which the structural funds are coherent with the country's National Action Plan for Social Inclusion (NAPSIIncl), which they should be, and engage with the managing authority on how to make them more coherent;
- Speak to people who manage the programmes to find out what they consider to be the aims and objectives; people on the monitoring committees (including the Commission and NGO representatives); and the beneficiary organizations;
- Look at *who* decides on the funds and the projects, and how they are chosen. Who selects projects? Based on which criteria? How are these weighted? Who is on the monitoring committees and how are they selected? Are there experts on social inclusion? Is gender balance taken into account? Are there open calls for proposals?;
- Examine the indicators, for that will point to who will benefit and in what way. Absence of indicators may be a warning sign;
- Then reach a judgement as to whether the funds are socially inclusive and to what degree.

Share the analysis with other social inclusion NGOs; with the actors in the structural funds (managing bodies, Commission, government departments and agencies, monitoring committee members); with the wider policy-making community (members of the national assembly or Parliament, the world of NGOs, academic experts, the media) and then begin a real dialogue over the role of the structural funds. Funding should be sought in the first instance from technical assistance from the funds themselves, but if that is not available, from other sources (public, private, foundations, research funds).

More than likely, the key documents on which a critical analyses focus will be the NSRF, the operational programmes and, once the programmes get under way, the

annual implementation reports. The NSRF stage has passed and will not be examined in detail here, but continues to provide an important context. In 2007, EAPN made an analysis of the NSRFs for 2007-2013. To give two extremes, some plans were professional with depth and breadth, gave detailed attention to social inclusion and the role of NGOs, announced measures which appeared to be well thought out, with attention given to indicators, monitoring and evaluation (e.g. Bulgaria). By contrast, other NSRFs were rushed, only interested in economic matters, barely mentioned social inclusion or NGOs and provided almost no useful financial or management detail (e.g. Netherlands). At this stage of the structural funds, NGOs are most likely examining the operational programmes. Again, the quality is variable, some giving more thoughtful treatment of social inclusion than others (e.g. the social infrastructure and social renewal operational programmes in Hungary). Generally, operational programmes follow a similar template: the preparation process, socio-economic context, strategy, priority axes, horizontal priorities, coherence with national and European Union policies, financial plans, implementation systems. Here is a model whereby one may make a critical analysis:

#### MAKING A CRITICAL ANALYSIS OF THE OPERATIONAL PROGRAMME

Section of NSRF/OP	
<b>Preparation, consultation</b>	* Were social inclusion NGOs consulted? How? What was the quality of the consultation? Were the comments taken on board? What learning on social inclusion was transferred, applied from 2000-6?
<b>Socio-economic context</b>	* How prominent is poverty, social exclusion in the context? What is the quantity and quality of information e.g. statistics provided on social inclusion? Are 'poor' people and 'poor' places identified? Are NGO information sources used? Does it acknowledge how serious the problem of poverty is? What explanations for poverty are given?
<b>Strategy</b>	* Is social inclusion declared as an objective, a vision? What is the underlying model of development? Does it redistribute resources to the 'poor', excluded? Is there a commitment to equality, or does it reinforce existing patterns of allocations? Is there quality consultation? Are the funds delivered through a bottom-up approach? Are excluded groups named, identified, targeted? Is there provision for global grants?
<b>Priority axes</b>	* How many axes deal with disadvantage? Who is targeted? Can we reach a % figure of how much reaches the excluded? In ERDF programmes, is there a social dimension?
<b>Horizontal priorities</b>	* Is social inclusion a horizontal priority? How is this done? Will social inclusion be a criterion for every project?

<b>Coherence with national, EU policy</b>	* Does it acknowledge national, European documents, strategies on poverty and exclusion? Are they cited, observed? Are the operational programmes (especially ESF) coherent with the National Action Plans for Social Inclusion (NAPSIncl) and Social Protection and Social Inclusion (SPSI)? Does it propose to make 'a decisive impact on poverty' (an objective set by the European Council in 2000)?
<b>Financial plans</b>	* <i>Cui bono?</i> Where does the balance of financial advantage go? Do they deliver to excluded people and places?
<b>Implementation</b>	* Are there social inclusion indicators? How good are they? Do delivery methods favour social inclusion NGOs (e.g. global grants)? Are social inclusion NGOs eligible for technical assistance? Are social inclusion NGOs on the monitoring committees (how are they chosen?) Is social inclusion part of the terms of reference of evaluation? Will the annual reports of the monitoring committee test for social inclusion?

## MAKING A CRITICAL ANALYSIS AS THE STRUCTURAL FUNDS ROLL OUT

Critical analysis of the structural funds is not something that happens only at the very start, but throughout the programming period. To do this, NGOs must follow the structural funds closely during the entire lifetime of the programme. Membership of the monitoring committee is probably the quickest way to get a regular flow of information on the structural funds (one reason why social NGOs try to get on them). A real challenge in following the structural funds is that of the large volume of information available: from a social inclusion perspective, only a small proportion is actually useful. Much of the information published about the structural funds is, for understandable reasons, promotional, but normally not very informative. At the other extreme, the most useful information can be kept secret (e.g. project selection process, unsuccessful applications). The level and practice of transparency varies from one country to another. Here is a guide of the key stages of the roll out of the structural funds and useful points to look out for:

### FOLLOWING AN OPERATIONAL PROGRAMME

Stage	
<b>Preparing projects</b>	Is there an open call for proposals? Who selects the projects? How are they chosen? By what criteria? How much does social inclusion count? Were social inclusion projects prioritized for early funding?
<b>Selecting projects</b>	What projects were selected? What were not selected? How do they contribute to social inclusion? What criteria, scoring systems were used? Do they draw in - or exclude - grass root, street level organizations?

<b>Monitoring</b>	Do you have the reports from the monitoring committees? Are they required to monitor for social inclusion? What do they tell us about social inclusion? Who contributes to discussion on social inclusion at monitoring committee meetings? How well have horizontal principles been observed?
<b>Evaluation</b>	What evaluations have been commissioned? Is social inclusion specified in the terms of reference? To what degree is it a feature of the subsequent reports? What impact are projects having on social inclusion?
<b>Dissemination</b>	What do the projects tell us about poverty and social exclusion? Are the results, outcomes disseminated? Effectively?
<b>Technical assistance</b>	Who benefits from technical assistance? Is it used to build the capacity of social NGOs? Are there provisions for capacity-building?

Social inclusion NGOs are not the only people interested in the structural funds and it may be possible to build up a dialogue with a broad range of people who are interested, like journalists, academics, experts in public administration, consultants and policy analysts. NGOs who develop a critical voice on the structural funds now could be quite influential in setting the agenda for 2014-2020 in the future (> *Chapter 8*).

➤ Some countries are more informative about the progress of the structural funds than others. Bulgaria, for example, has a Call for proposals page on its structural funds website, which should make it possible to follow all the calls under the different operational programmes, as well as a News section ([www.eufunds.bg](http://www.eufunds.bg)).

➤ In Britain, the London Voluntary Sector Training Consortium publishes a regular newsheet, London Euroscene, following the structural funds, [www.lvstc.org.uk](http://www.lvstc.org.uk).

## ☞ CASE STUDY: COMMENTARY ON HOW THE STRUCTURAL FUNDS ROLL OUT IN BULGARIA

The Amalipe Centre in Veliko Turnovo, Bulgaria, publishes a monthly newsletter on its work in Bulgarian and English, with a focus on the campaigns of Amalipe and other Roma organizations carry out on the structural funds. The newsletter does not just describe structural funds programmes, but runs a critical commentary on them as they roll out, as the following titles of articles suggest: *More administration, less civil society in implementation of HRD OP in 2008* and *HRD OP: results achieved, activities forthcoming*. These articles are sharp, informative, to the point and widely distributed. One article, for example, *Structural funds and educational integration* was extremely critical of the size of educational projects, delays in rolling out the programme and the provision of funding for segregated schools. Download in pdf from [www.amalipe.com](http://www.amalipe.com)



## ☞ CASE STUDY: ANNUAL MEETING BETWEEN COMMISSION AND GERMAN WELFARE AGENCIES

The Federal Association of Voluntary Welfare Agencies in Germany holds an annual meeting in Brussels between, on their side, their members on the monitoring committees at national and regional level and, on the other, the team of desk officers in the Commission's DG EMPL responsible for the ESF intervention in Germany. The main subject areas covered are implementation, partnership, social inclusion and combining the national action plans for social inclusion and the ESF.

## INCLUSION-PROOFING IN PRACTICE

Governments should, ideally, 'inclusion-proof' the structural funds. This means that all programmes should contribute, in some way, to social inclusion. It means more than a sprinkling of social inclusion projects here and there. A few small, well-publicized, high-visibility projects may create a feel-good factor about the structural funds, but will have little impact if the funds as a whole do not contribute to inclusion and are not 'inclusion-proofed'.<sup>3</sup>

### Social inclusion proofing

The process by which the bodies that managed the structural funds *systematically* examine programmes at their *design, implementation* and *review* stages to test their impact (or likely impact) on poverty and on the inequalities likely to lead to poverty.

Inclusion proofing is about looking out for what is *not* there, as much as what is. The ERDF, for example, can fund social infrastructure, community development, neighbourhood services – but it rarely does so, focussing instead on 'hard' infrastructure like motorways and bridges.

## EXAMPLES OF INCLUSION-PROOFING IN PRACTICE

There is evidence that some structural funds programmes make significant efforts to contribute to social inclusion. The real test is the analysis of the detail.

The NSRF in Slovakia has four horizontal priorities: equality of opportunities, sustainable development, the information society and marginalized Roma communities. These horizontal priorities must be applied, to a greater or lesser degree, across a range of programmes and are most evident in the operational programme for education, priority axis 3 *Support for education of persons with special educational needs*, with measure 3.1 specifically including Roma communities. The operational programme for research and development for jobs creation, though, does not mention the Roma community: it is 'neutral to this group and offers career opportunities to everybody' and observes the principle of anti-discrimination. But is this enough?

<sup>3</sup> Kathy Walsh: *Inclusion proofing the structural funds*. Dublin, Combat Poverty Agency, 2006, unpublished.

In Austria, the reinforcing of social inclusion is declared as a clear task within the nine regional operational programmes, the three national operational programmes and the €800m programme of 20 Territorial Employment Pacts (TEPs). One of the TEPs involves NGOs (Styria), [www.pakte.at](http://www.pakte.at).

In Bulgaria, the operational programme for regional development has a horizontal objective of equality and nondiscrimination, which scores higher projects aimed at the Roma community and people with disability. There are measures to renovate the social infrastructure.

In Portugal, there is an operational programme *Human potential*, with priorities for employment, education, training, mobility, social cohesion and gender equality.

Across the full range of the structural funds, these are what we should look out for in examining whether the funds operate inclusively or not.

**SOCIALLY INCLUSIVE OR NOT? PROGRAMMES TO WATCH OUT FOR**

Programme	Socially inclusive	Not so inclusive
Transport	Buses and trains for those with least access to transport (poor, rural areas).	Motorways
Health	Community facilities in low income, poor areas	High-tech facilities used by those already with resources
Labour market	Those with few or no educational qualifications, early school leavers, informal learning and education programmes	Those already with qualifications, e.g. post-graduates
Entrepreneurship	Unemployed people, lone parents, ethnic minority communities e.g. Roma economy	Existing entrepreneurs
Tourism	Small, locally owned facilities, run by people on low incomes, rural areas ('soft' tourism)	Big hotel projects ('hard' tourism)
Environment	Urban areas with most degraded environments; waste disposal services for people on low incomes	Visual improvement of downtown malls; high charges for waste services.
Farming	Assistance for low-income farmers, poorest agricultural areas, smallest farms	Requirements for minimum size of farm
Energy	Fuel poverty, fuel problems for low-income groups and areas	Undifferentiated facilities e.g. power stations
Information society	Broadband for low-income groups, schools, low-income areas	Ability to pay

None of this is to say that the structural funds should not provide funding for projects to which all citizens should have access (e.g. motorways, water services, power stations, broadband), but it does suggest that if they are socially inclusive, such resources should be *concentrated* so as to reach those who have least.

### CHECKLIST FOR SOCIAL INCLUSION NGOS

- Do you have a mailing list of all the structural funds actors? Are there particular allies you can build up there?
- Have you made a critical analysis of the structural funds? Have you 'social inclusion - proofed' the structural funds?
- Can you estimate how much of (1) the structural funds as a whole and (2) individual operational programmes go to social inclusion? Are there some parts that are especially commendable for their methods, approach, targeting? Bad practices?
- Do you have a strategy for following the structural funds over 2007-2013 and providing an on-going commentary and analysis? What about a 'social inclusion mid-term review' in 2010?
- Can you use your analysis as a basis for changing the allocations, values, model of development and approach for 2014-2020?

CHAPTER 5

# CRITICAL MONITORING AND EVALUATION

Monitoring is essential for efficient management, to ensure that money is spent for the purposes for which it is prescribed and to obtain the intended results. Here, our interest is in monitoring to ensure that the structural funds are effective instruments for building social inclusion. Chapter 5 reviews the role of social inclusion NGOs in monitoring and in the related process of evaluation.

## INTRODUCING MONITORING COMMITTEES

Monitoring is a continuous process which follows the structural funds in real time. This is done through monitoring committees. The broad purpose of the monitoring committees is first to check that a programme's money allocated is spent and spent properly and for the purpose for which it is intended; and second to observe the effects and outcomes of programmes and projects. Monitoring committees have a role of strategic oversight – to test if programmes are achieving their overall objectives – but despite the Commission's best efforts, monitoring committees have focused on the speed of development of programmes and their financial aspects, paying little attention to outcomes, impact or strategic concerns. Ultimately, the effectiveness of monitoring depends on *who* monitors, *what information* is collected and *how* the knowledge arising is put to use.

Under the general regulations, managing bodies are formally responsible for the efficiency and correctness of the monitoring and evaluation systems. Managing bodies must set up financial and statistical monitoring systems, send annual reports (called annual implementation reports) to the Commission by 30<sup>th</sup> June each year and ensure



Participants discuss how to become visible, Vienna, 2006 © lynn@art / Armutskonferenz

compliance with European Union policies. General regulation §§63–68 specifies that there be a monitoring committee for each operational programme, whose tasks are to approve funding criteria, review progress on the achievement of targets, examine results, consider and approve annual programme implementation reports and possibly make proposals to amend the programme. It is also open to member states to have dedicated monitoring committees for horizontal issues, such as gender, the environment and social inclusion. Social inclusion NGOs interested in membership of monitoring committees must make their interest known to the managing authorities, though the actual selection process should be an open one (>Table, below).

Monitoring committees are anchored in government departments, Ministries and state agencies delivering the programmes, with representatives from the European Commission. Over time, the following changes have taken place:

- With the introduction of the partnership principle, some NGOs have begun to find places on specific committees (e.g. environmental NGOs on environmental operational programmes; social inclusion NGOs on social programmes), but not yet on programme committees further afield, especially in the ERDF;
- In the 2007-2013 round, the Commission’s role has become much less visible (a function both of subsidiarity and the lack of officials to attend meetings in 27 states);
- In some countries, monitoring meetings have become less frequent, annual rather than twice a year.

Ever since 1988, social inclusion NGOs have attempted to obtain places on the monitoring committees. Although getting onto monitoring committees may bring recognition and prestige, it is not an end in itself.

## WHY MONITORING COMMITTEES ARE USEFUL

### Why monitoring committees are useful

- Flow of information, knowledge about structural funds operations
- Improved access to officials and the administrative élite
- Improve programmes and measures – make them more inclusive
- Improve social inclusion indicators
- Ensure social inclusion is prioritized in annual and other reports
- Make social inclusion foremost in evaluation
- Build allies and supporters

## EXAMPLES OF NGOS ON MONITORING COMMITTEES

For 2007-2013, social inclusion NGOs managed to achieve the following representation on monitoring committees:

In Hungary, there is representation on the monitoring committees for Roma people, equal opportunities organizations (gender) and people with disabilities, as

specified in the operational programmes. In the programme most important for social inclusion, the operational programme for social renewal, two members of the Hungarian Anti Poverty Network are represented.

In Finland, 40 NGOs are represented on monitoring committees. Nine are represented on monitoring committees in Estonia. In the Czech Republic, NGOs are represented on a number of monitoring committees and on the INTERREG cross-border programme as an observer.

In Spain, EAPN Spain achieved representation in 2007-2013 for the first time on the monitoring committee of the operational programme for the struggle against discrimination. Other members of the committee come from measure managers (10), the European Commission, the government, regional authorities, the ten intermediary bodies participating in the programme (public administration and NGOs) and other networks (e.g. equal opportunities, social inclusion) (7). In Portugal, EAPN Portugal participates on the operational programme for the northern region, but finds it 'more informative than consultative'.

In the Slovak Republic, non-profit NGOs are represented on the operational programme for education, but not necessarily social inclusion NGOs.

In Greece, the European Commission 'negotiated and obtained' from the Greek authorities arrangements for NGOs on the monitoring committees.

In France, both the umbrella body for social and health NGOs, UNIOPSS and the NGO concerned with homelessness, FNARS are represented on the national ESF monitoring committee. Regional FNARS organizations participate on the regional ESF committees where 85% of the ESF is spent.

In Ireland, several NGOs are represented on monitoring committees: Irish National Organization of the Unemployed (Human Capital Investment operational programme), Irish Rural Link (Border, Midland and Western regional operational programme), Community Workers Cooperative (Peace III, INTERREG IV).

In Britain, NGOs are represented as full partners on all the monitoring committees and sub-committees and focus on a wide range of issues including evaluation, diversity, sustainable development and the transnational programme.

In Germany, the Voluntary Welfare Agencies are represented on the ESF and ERDF monitoring committees in every state and at the national level. NGOs in the areas of social inclusion, environment and gender are represented on operational programme monitoring committees and on the NSRF monitoring body at the Ministry of the Economy.

In Slovenia, social inclusion NGOs choose a representative on the monitoring committee of the operational programme for human resource development.

Getting on a monitoring committee is only half the task. Once there, NGOs must be effective advocates for social inclusion. They must be able to use the procedures of the monitoring committee effectively to question, challenge and find an opportunity to argue their case. They must report back to other actors concerned with social inclusion. Some monitoring committees are more open and friendly than others. Some are poorly managed, with large volumes of paperwork sent out too late to be considered in advance of meetings. Some are better at making their documentation available than others (e.g. automatically posting minutes on their website).

NGOs may wish to think of setting minimum standards for monitoring committees, proposing that these be adopted across the broad range of these committees. Some suggestions are made in the table below.

SUGGESTED MINIMUM STANDARDS FOR MONITORING COMMITTEES

Suggested minimum standards for monitoring committees
Committees to include a wide range of participants representing the target groups
Transparent selection process for social inclusion NGO representatives
NGOs participate as full members, not just observers
Technical assistance to ensure participation of NGOs
Transparency: details of membership, meetings, agenda posted on website
Meet participation costs of NGOs
Meetings sufficiently frequent to enable meaningful monitoring
Professional management: documentation sent out in time, decisions taken at meetings and not by written procedure outside meetings, measure managers provide reports on time

☞ CASE STUDY: REGIONAL OPERATIONAL PROGRAMME IN CASTILLA LA MANCHA, SPAIN

Seeking to play an active role in the regional operational programme for the structural funds, EAPN Castilla La Mancha (EAPN-CLM) organized an information seminar *The structural funds 2007–2013 – the participation of NGOs* in May 2006, organized by Fundación Luis Vives and which involved publicizing and distributing the second EAPN manual on the structural funds. Eighty NGOs attended and EAPN-CLM went to some efforts to ensure the participation of the regional government and ask for information about the prospects for their participation in the upcoming 2007-2013 round. The outcome of the seminar was a working group between the regional administration, social inclusion NGOs and EAPN-CLM to amend and improve the draft operational programme for the region. The working group presented proposals *The participation of the third sector – the region we want*, followed by a series of informal meetings with those concerned with the structural funds in the region.

Following this, the regional administration invited EAPN-CLM to participate in a thematic group, bringing in managers of EQUAL projects and other social organizations, to devise social inclusion measures for the forthcoming operational programme. They drew on documents and studies of successful social interventions, making it a serious undertaking leading to concrete proposals which convinced the regional authorities of their capability. Five months later, EAPN-CLM was rewarded with a place on both the ESF and ERDF monitoring committees for the region.

### ☞ CASE STUDY: NGOS ON THE MONITORING COMMITTEES IN BULGARIA

When it became apparent that there was no system whereby Roma organizations could elect their own delegates to the monitoring committee for crucial Human Resources Development programme, 53 organizations sent a letter of protest to the prime minister, Sergei Stanishev and to the European Commission, insisting on NGO representation on the monitoring committees. Although the Commission formally took the view that the exact composition of the monitoring committee was a matter for the member state, it sent a supportive letter to the Roma organizations, urging them to continue their efforts and expressing the view that what they were doing was consistent with the partnership principle.

The Minister for Finance appointed a commission to determine the nature of NGO participation in the monitoring committees. The Ministry set down the principle that there should be a system whereby NGOs interested in participating in monitoring committees should 'declare their interest'. Criteria should be set down and there should then be an election, the purpose being to obtain an open and transparent procedure. The eligibility criteria for organizations were:

- Three years in operation;
- Experience in policy and strategic work, including monitoring;
- Previous experience of EU projects.

Three NGOs were elected to the national, NSRF monitoring committee, one of them being the Amalipe Association of Veliko Turnovo, one of the centres best known for working with the Roma community. The monitoring committee of the human resources operational programme also appointed a working group to see how NGOs could best be accommodated. It decided on using criteria similar to the NSRF committee, with six panels of NGO participants: education, discrimination, Roma integration, health care, social issues and science. One was elected from each, with a system of substitute delegates. Roma NGOs also obtained representation on the operational programmes for regional development, administrative capacity, competitiveness and rural development.

When problems developed with the Human Resources Development operational programme in Bulgaria, the monitoring committee obtained a meeting with the deputy prime minister and minister responsible for European affairs. Here they raised a series of issues that had arisen, such as the lack of independence of the project assessment



committees and delays in providing funding for projects that had been approved. The deputy prime minister welcomed the contribution of NGOs and pledged to improve the transparency of structural funds operations.

## MONITORING FOR SOCIAL INCLUSION

As important as *Who monitors?* is *What is monitored?* There is no point in social inclusion NGOs obtaining places on monitoring committees if there are no systems in place to ensure that data on social inclusion are collected. A good system of indicators, with social inclusion indicators, is a first step (>Chapter 6). The second is that measure managers be specifically required to report back on the contribution of their measure to social inclusion. The third is to ensure that these reports are made and that they are informative. This can be quite a struggle for agencies not familiar with issues of social inclusion – but all the more reason to have NGOs involved in the structural funds so as to help them. To put such a system in place may be one of the first challenges for organisations arriving on monitoring committees. The table lists the type of tests which NGOs might apply:

### TESTS FOR SOCIAL INCLUSION MONITORING

Tests for social inclusion monitoring
Are measure managers required to report on the impact of their measure for social inclusion? Is there a common template?
How much of their routine reports deal with social inclusion? Is this information provided informative, useful?
Do these reports show evidence of more inclusion?
What is the quality of analysis? Is it self-critical? How is it informed? By who?
Are reports on social inclusion a regular agenda item on the monitoring committee?
How prominent is social inclusion in the Annual Implementation Report?
Is there any strategic thinking about how to promote inclusion in the remainder of the operational programme, or the next programme?
Is monitoring linked to the priorities, objective and targets of the National Action Plans for Social Inclusion (§4, ESF regulation)

The quality of Annual Implementation Reports (AIRs) varies. The annual report for the *Sectoral operational programme for human resources in the Slovak Republic, 2006*, for example, had an unusual breadth and depth of detail. The report provided not only a volume of statistics, but an analysis and commentary on trends, with recommendations as to how future programmes should be refocused. Detailed information was provided on how technical assistance was spent.

## EVALUATION FOR SOCIAL INCLUSION

Evaluation is provided for in §47-49 of the general regulation. Traditionally, evaluations were carried out at three points: before the programming period came into operation (the *ex ante* evaluation), the mid-term point and after the programme was completed (*ex post*). Now, for 2007-2013, member states are required only to carry out an *ex ante* evaluation, while *ex post* evaluations are the responsibility of the Commission in cooperation with the member state. The mid-term evaluation is no longer required, but there is a general onus on member states to evaluate:

*Member states shall provide the resources necessary for carrying out evaluations, organize the production and gathering of the necessary data and use the various types of information provided by the monitoring systems. Member states shall carry out evaluations linked to the monitoring of operational programmes.*

Some programmes still have a mid-term evaluation (e.g. the operational programme for social renewal in Hungary). The role of *ex ante* evaluations is to check whether draft operational programmes are in line with European objectives (coherence) and test the draft for disparities, gaps, goals, targets, intended results, lessons from previous programming and quality of procedures for implementation, monitoring, evaluation and management. Generally, these documents have limited circulation, give little attention to social inclusion and rarely make critical comment. A notable exception for 2007-2013 was the informative VVMZ consultants' report *Ex ante evaluation of the operational programme Employment and social inclusion* in the Slovak Republic.

Here, the two key questions are: Does the evaluation process of the structural funds address issues of social inclusion? Second, are social inclusion NGOs involved or consulted in the evaluation process? Traditionally, NGOs have been little involved or consulted in the evaluation process. Some member states bring evaluation issues to the monitoring committees and here, NGOs have the opportunity to comment on the criteria for evaluation (e.g. social inclusion) and on the outcomes. In others, though, evaluation is organized by the managing authority with little consultation with social inclusion NGOs (or anyone else), a bad habit which should be challenged.

The involvement of NGOs in evaluation is unusual, a rare exception for 2007-2013 being Spain, specifically the regional operational programme of Andalucía, where the EAPN regional network participated in the *ex ante* evaluation of this programme. In the 2000-6 round in Ireland, there is an example of a state agency making a systematic attempt to improve the quality of indicators, monitoring and evaluation. The Combat Poverty Agency found out who the evaluators were and got meetings with them in order to persuade them of the importance of testing for social inclusion. The subsequent evaluation reports were extremely critical of the way in which the funds did not test for social inclusion and made recommendations for improvement of indicators, some of which were adopted for the rest of the 2000-6 round.

Ultimately, the purpose of monitoring and evaluation is to learn, by 2013, in the area of social inclusion, *What works?* and whether we can apply those lessons to national programmes and the next round of the structural funds.

## TESTS FOR MONITORING AND EVALUATION FOR THE PROGRAMMING PERIOD

Tests for monitoring and evaluation	
Knowledge	As a result of structural funds interventions, do we know more now about poverty and exclusion than before the programme started?
Benefits	Do we know how many people benefited from structural funds interventions and in what way?
Effectiveness: what works?	Do we know what projects, methods and approaches actually work?
Dissemination	What arrangements are made to disseminate that knowledge?
Transfer	How can we transfer that learning to national programmes and to the next round of the structural funds, 2014-2020?



Discussion with regional representatives, Graz, Austria 2007 (c) lynn@art / Armutskonferenz

## ☞ CASE STUDY: GETTING FEEDBACK AT THE END OF THE PROGRAMME IN MALTA

The managing authority of the structural funds in Malta held a closure conference for the 2000-6 round of the funds to examine the issues arising with a view to improving implementation for 2007-2013. Questionnaires were sent to project leaders asking them to rate their experience in such areas as support from the managing authorities, payments, indicators, financial management, contracts, monitoring, audit and control. While the focus was on management rather than strategy, it is the only known example of a managing authority systematically seeking feedback from projects.

### CHECKLIST FOR SOCIAL INCLUSION NGOs

- Do you know which social inclusion NGOs are on monitoring committees? Do they report back to the wider social policy community?
- If you are on one, do you have a plan to use the monitoring committee to your advantage? E.g. access to officials, improved monitoring and evaluation?
- How effective is the monitoring process for social inclusion? Does the monitoring committee send for systematic, structured information on social inclusion from the measure managers? Do you get these reports in sufficient time to read, study and analyze? How important is social inclusion in the annual implementation reports? Are these reports disseminated (e.g. posted on the internet?) Is there a working group to look at monitoring for social inclusion?
- If not, do you get the monitoring committee reports? What do they tell us? How informative is the annual implementation report? Can they be improved? Do you have a system of dialogue with the authorities on monitoring?
- What system of evaluation is in place? What is your level of contact or dialogue with the people who decide and organize evaluation? Can you persuade them to prioritize social inclusion in the evaluation process?
- Do you get the evaluation reports? How useful an instrument are they for testing for social inclusion? Can future evaluations be improved? Do you have a system of dialogue with the authorities on evaluation?

## CHAPTER 6

## DEVELOPING INDICATORS

Indicators may at first sight appear to be an obscure, difficult technical subject with little direct connection to social inclusion. In reality, indicators are enormously important, for they are the means whereby we can tell if the structural funds are making an impact, in our case in the area of social inclusion – or not. This chapter looks at social inclusion indicators and the role which NGOs should play in refining and improving them.

## AN INTRODUCTION TO INDICATORS

Indicators are markers to indicate what progress is being made towards achieving a set outcome. Normally, a social or economic programme has a starting point indicator (called a base line) and an end-of-programme indicator or target to mark the achievement of progress. Some have a mid-point, or even annual targets, as well.

Indicators are an important way whereby we know if programmes are effective, efficient, value-for-money or impactful. Without indicators, it is difficult to know if programmes promote social inclusion or not, to what degree, or even if they have an exclusionary effect. The general regulation §37.1 requires operational programmes to have a limited number of proportionate indicators which quantify targets and *make it possible to measure progress in relation to the baseline situation and the achievement of the targets of the priority axis.*

#### Why have indicators?

It is not good enough to state that something is good or something is being done. It must be possible to demonstrate that something is being done well. This is not to put an additional burden on managers, but a desire to formulate a rational, structured system of assessment to ensure that maximum benefit is derived from scarce resources.

– ESF Programme Evaluation Unit.

Indicators can range from the large scale to the small scale. As an example of a large-scale or macro indicator, it can be the objective of structural funds programming to reduce the level of relative poverty from 20% in 2007 to 16% by 2013, 20% being the baseline indicator and 16% being the end-of-programme indicator. These are sometimes called *headline indicators*.

Most indicators in the structural funds are output indicators, for example measuring the number of persons trained, comparing 2007 to 2013. Some do so according to the different target groups (e.g. unemployed people, lone parents) and all programmes are expected to employ cross cutting indicators to test for the participation of women in programmes. From the point of view of social inclusion, our main interest is the *impact* of programmes on social inclusion and we are interested to test what indicators tell us about:

- *Who* participates in structural funds measures? Do they come from disadvantaged groups, from which social class? (e.g. unemployed, people with disability) (these are called *participation indicators*);
- Do they come from disadvantaged areas? Are projects located in disadvantaged areas? (these are called *location indicators*);
- *How* do they benefit? In the case of training programmes, do they obtain certification? What is their experience of participation? Are there personal gains? What is their level of satisfaction with the experience? (these are called *outcome indicators*); and
- Do they benefit *after* the programme ends? In the case of training, do they obtain work afterwards (and is it quality work)? Does their standard of living and situation in life improve? (these are called *progression indicators*).

General experience shows that the structural funds indicators are good at counting the numbers of projects and who participates in them - but they are weak at telling us what this does for social inclusion, or what happens to participants afterwards. Some examples are given of indicators that do test for social inclusion.

EXAMPLES OF INDICATORS USED FOR SOCIAL INCLUSION, BY THEME

Theme	Indicator
Training programmes	<ul style="list-style-type: none"> <li>* People from disadvantaged locations</li> <li>* People from target groups at risk of poverty</li> <li>* Their perception of the benefit of the intervention</li> <li>* Their situation a year, two years later</li> </ul>
Capital projects e.g. facilities	* Located in disadvantaged areas
Agricultural assistance	* Proportion going to low - income farmers, small farms
Transport	* Usage by disadvantaged groups (older people, isolated rural areas, satellite towns, people with disabilities, women)
Industrial assistance	<ul style="list-style-type: none"> <li>* People in disadvantaged locations</li> <li>* Disadvantaged beneficiaries e.g. unemployed, minorities</li> </ul>
Tourism assistance	* Low-income households
Job creation programmes	* Quality of work, minimum wage
Energy	<ul style="list-style-type: none"> <li>* Temperature improvements in low-income homes</li> <li>* Spending on fuel by people on low incomes</li> </ul>
Information society	* More use by low-income groups, low income locations

This is much more challenging than counting heads at training courses but ultimately will tell us whether the funds are making a positive impact for social inclusion. Some of these measurements are best made by targeted and qualitative evaluations, sometimes carried out some time after the intervention is over. That, after all, is one of

the purposes to which technical assistance can be put. A good system of indicators involves a multiplicity of methods and approaches, quantitative and qualitative.

### ☞ CASE STUDY: HEADLINE AND OTHER INDICATORS IN THE SLOVAK REPUBLIC

The operational programme for employment and social inclusion in Slovakia, for example, has a combination of large scale indicators (the national poverty rate, which it has the ambition to reduce from 13% to 9%), project indicators (number of social inclusion projects supported), participation indicators (number of persons trained, certified), outcome indicators (jobs created). In 2006, the use of indicators was supplemented by special studies funded through technical assistance, for example on the outcomes of activation measures for people with disabilities.

Some countries give more attention to issues of indicators than others. Bulgaria for example provides a thoughtful and readable background paper *Guidelines for indicators for Bulgarian NDP and operational programme*, see <http://www.eufunds.bg>

Indicators provide an opportunity for social inclusion NGOs to take a lead and upskill themselves and other NGOs. Although it is a technical area, it is also about values and priorities. NGOs that develop skills, viewpoints and policies here are in a good position to influence the next round of the funds. Because governments are often short of skills in this area, they may also be listened to, more than usual.

It is also important that indicators in the structural funds complement indicators used in the National Action Plans for Social Inclusion (NAPSIincl) and strategies for Social Protection and Social Inclusion (SPSI). Conversely, there is no point in having different systems to measure similar activities or programmes. For more information on indicators at European and member state level, see [http://ec.europa.eu/employment\\_social/spsi/common\\_indicators\\_en.htm](http://ec.europa.eu/employment_social/spsi/common_indicators_en.htm)

### HARD AND SOFT INDICATORS

Most of the structural funds lend themselves to measurement by what are called 'hard' indicators, concrete and readily measurable indicators such as kilometres of motorway constructed, length of railway track upgraded and so on. Measuring social inclusion outcomes is more subtle, involving a mixture of what are called 'hard' and 'soft' indicators. Structural funds indicators have generally used hard indicators more than soft indicators, but it is important that in the social field, both be used.

Soft indicators are difficult because the outcomes are less absolute and clear. Nevertheless, they offer opportunities for participants themselves to assess the outcomes of the interventions, measure the progress that they are making and test the quality of programmes. Soft indicators may be best collected through evaluation reports that complement the regular reporting cycles of hard indicators. Here are some examples of hard and soft indicators in the social policy area:

HARD AND SOFT INDICATORS

Hard and soft indicators	
Hard indicators	Soft indicators
Numbers starting, completing a training course	Improved level of self-esteem
Numbers gaining a qualification (and level)	More confidence in managing money
Numbers getting work (and skill level, wage level)	Language, numeracy, literacy skills
Numbers moving into accommodation	Ability to write job applications, CVs
	Work habits (teamwork, time management)

Source: *A practical guide to measuring soft outcomes and distance travelled, guidance document. Welsh European Funding Office, 2003.*

### CHECKLIST FOR SOCIAL INCLUSION NGOS

- What indicators are used in your operational programmes, priorities, axes and measures? Can you compile and characterize them? Are they linked to the National Action Plans for Social Inclusion (NAPSIncl) and strategies for Social Protection and Social Inclusion (SPSI) and how?
- Do they provide a good, working combination of indicators: headline, participation, location, outcome, progression, using quantitative and qualitative methods? What is missing? What is not measured?
- Have you made a commentary on these indicators? Have you made that part of your critical analysis? Can you familiarize other social inclusion NGOs with indicators? Have you made known your views to the structural funds actors (> Chapter 4).
- Can you make proposals for the improvement of indicators – either for the rest of this round, or the next? Can you propose your own indicators?



## CHAPTER 7

## POST-EQUAL

One of the most positive features of the 2000-6 structural funds from a social NGO perspective was the EQUAL programme, which funded over 2,000 social inclusion NGOs in projects for inclusion and equality. There is no EQUAL programme in 2007-2013, for its concepts were supposed to be mainstreamed. Here we review how social inclusion NGOs participate in the post-EQUAL mainstreaming process and transnational projects.

## INTRODUCING EQUAL AND WHY IT WAS IMPORTANT

When the reformed structural funds were introduced in 1988, there was a number of what were called Community Initiative Programmes (CIP) to enable the structural funds to achieve specific, important objectives (e.g. counteract labour market discrimination). Unlike the main funds which were determined on a country-by-country basis, the CIPs applied common criteria across all member states. At one stage, there were as many as 13 CIPs, but in the 2000-6 round they were reduced to four (EQUAL, INTERREG, URBAN, LEADER) and now there are none. Many CIPs facilitated the involvement of NGOs and the EQUAL programme supported over two thousand social action NGOs over 2000-6. The European Anti Poverty Network strongly opposed the ending of the EQUAL programme. The Commission responded by issuing a guideline, one of the Community Strategic Guidelines (CSGs), stating that EQUAL must be mainstreamed in the 2007-2013 round and its objectives achieved through the national programmes. Specifically, the guideline stated:

*§1.3 The experience of the EQUAL Community Initiative should be capitalized through the mainstreaming of the principles on which it was built - innovation, transnationality, partnership, gender mainstreaming.*

The preamble to the ESF regulation states:

*§6. New lessons have been learnt from the Community initiative EQUAL [which] should be integrated into ESF support. Particular attention should be paid to the participation of target groups, the integration of migrants including those seeking asylum, the identification of policy issues and their subsequent mainstreaming, innovation and experimentation techniques, methodologies for transnational cooperation, outreach to groups marginalized in relation to the labour market, the impact of social issues on the internal market and access to and management of projects taken on by non-governmental organizations.*

## INTRODUCING POST-EQUAL

EQUAL was important, not just in providing access to the structural funds for NGOs that carried out important work in the area of social inclusion, but because of its key features: empowerment, the bottom-up approach and transnationality. Granted that

the Community Strategic Guidelines expected member states to mainstream EQUAL, the key tests are:

- Can we identify a stream of programming with identifiable EQUAL principles? Can we see *partnership, gender, innovation and transnationality*?
- Is there access to such programming by social inclusion NGOs, with an open call for proposals?
- Specifically, is there budgeting for transnationality?

### EXAMPLES OF POST-EQUAL MAINSTREAMING

In Spain, several new multi-annual projects have been funded for the 2007-2013 period which are descendants of projects developed during EQUAL. Examples are SARA, a Red Cross and CEPAIM (Consortio de Entidades para la Acción Integral con Migrantes) project working with women immigrants and which produced the guide *Dinamización espacios desarrollo personal y profesional para mujeres inmigrantes*; SENDEROS, social work assistance to immigrant families in rural areas and ARIADNA. The ARIADNA network is based on its former EQUAL partners: four state refugee centres (CAR) belonging to the General Directorate for the Integration of Immigrants (DGII) in the Ministry for Labour and Integration; and three widely experienced asylum and immigration NGOs: the Spanish Red Cross; ACCEM, the Spanish Catholic Commission for Migration and CEAR, the Spanish Commission for Refugees.

In Austria, a report was published *Mainstreaming unter der Lupe* ('Mainstreaming in focus') identifying the success factors in the EQUAL programme and since then a small number of projects have been funded.

With EQUAL, projects were expected to work with like-minded partners from other member states, transnationally. As a result, a significant level of learning transferred from one member state to another. This is done in three main ways:

- As a dedicated priority. So far as is known, only 42 out of 117 ESF operational programmes make direct provision for transnationality, with a total of €1.43bn allocated (e.g. France, Romania, Bulgaria, Germany);
- As a horizontal theme, within existing funding lines, worth about €1.5bn (e.g. Malta);
- Or as a combination of both (e.g. Spain).

In 2007, the European Commission asked the national ESF managing authorities to set up national contact points to promote transnationality and indicated an interest in setting up, at a later stage, an information exchange and learning network. Information is supposed to be available on a dedicated website ([www.transnationality.eu](http://www.transnationality.eu)). At the time of writing this report, this site is unusable: it is protected with a registration and password system, only limited information is available and its links are dysfunctional with some pages not available. There is an internet tool for a transnational partner search at [www.transnational-toolkit.eu](http://www.transnational-toolkit.eu).

- Social inclusion NGOs should locate their national contact points for post-EQUAL transnationality. They may be the ESF unit or old EQUAL support structures.

A general criticism is that in many countries, post-EQUAL transnationality provision is vague. There are some countries where operational programmes are more specific about what may be funded under transnationality, for example, projects for networks, study visits, exchanges of good practice, seminars, publications, tools and training materials. Some countries are very open about the themes that can be funded, while others are more specific (e.g. labour market re-integration). The level of transnationality can vary from being a minor theme in a project (e.g. translation of a product) to a project that is largely transnational in nature.

### EXAMPLES OF POST-EQUAL TRANSNATIONALITY

We have some information on how transnationality has progressed:

In Germany, there is a transnational ESF programme called IdA, *Integration durch Austausch* ('*Integration through Exchange*') for exchanges for those furthest from the labour market and for transnational thematic learning networks and cooperation. For the exchanges, a number of target groups were identified, such as young people at risk, lone parents, early school leavers and unemployed young people. For the thematic networks, a number of subject areas are proposed, such as start-up support, ex-convicts, migrants, gender mainstreaming, asylum, age management and victims of trafficking. The first two calls for proposals were made in 2008. Funding was set at up to €2m for up to three years a project at a rate of between 60% and 85%. Details: [www.esf.de](http://www.esf.de).

In Spain, the operational programme against discrimination has provision for transnationality and this funds an international network of Roma organizations. Called EURoma, this involves NGOs from 12 member states engaged in a project of thematic conferences, working groups, projects, e-bulletin and website.

In Hungary, there is a transnational axis in the operational programme for human resources and employment. Likewise, transnational and innovative projects are mentioned in the *Social renewal* operational programme.

In the Czech Republic, the *Human resources and employment* operational programme states that it will develop the principles of 'innovation, partnership and transnationality'.

Luxembourg decided to focus its transnational programme on the region around Luxembourg, supporting labour market transnational initiatives with Lorraine, Wallonia, Rhineland Palatinate and the Saar. We do not know the scope for NGO involvement in these three cases.

In France, the first country to invite proposals, there is a transnational strand to the ESF *Innovatory transnational and interregional actions* managed by the inter-

mediary organization Racine. A first request for projects was made in March 2008, closing in June 2008, with a fresh call due in 2009. There is funding for about 50 projects a year, averaging €80,000 each. Projects are for one year only, with a subvention rate of 55% under three axes: innovatory and experimental projects, innovation partnerships and transnational cooperation. Innovatory and experimental projects covers the struggle against discrimination and lifelong learning through new tools and methods. Innovation partnerships cover youth employment, helping those furthest from the workforce, the recognition of qualifications and new entrepreneurial activities through the dissemination of good practice, the development of tools and meetings. Transnational cooperation supports people most vulnerable on the labour market through mobility actions and exchanges of know-how and work practices for professionals and apprentices, as well as the mutual recognition of qualifications. This is an example of what an extensive transnational programme could look like.

In Britain, the transnational element of the ESF has made progress despite there being no specific priority identified for transnationality in the original operational programmes. In England, NGOs managed, through the monitoring committee, to define two of the six transnational themes, *Active inclusion* and *Social enterprise*. In both cases, NGOs were asked to prepare the national briefings that now guide the programme. *Active inclusion* is a theme of particular interest, for social NGOs had earlier argued, but unsuccessfully, for it to be a priority within the operational programme. Now, as a transnational programme, social NGOs reintroduced the theme with the support of the European Commission consultation on active inclusion and EAPN's policy briefings. The outcome is that *Active inclusion* has been prioritized in eight of the nine English regions.

In Portugal, EAPN participates in several transnational projects, such as *Bridges for inclusion* (PROGRESS), drugs and Roma communities (public health programme), but none are in the post-EQUAL programme.

In Spain, the managing authority for the ESF has issued a 46-page *Guía de cooperación transnacional para el nuevo período de programación FSE - España 2007-2013* ('Guide to transnational cooperation for the new programming period for the ESF, Spain, 2007-2013'). This provides contextual information; tips on how to prepare transnational cooperation; information on networks; advice on preparatory meetings; suggestions for study visits; practical guidance on financial planning; and comments on evaluation and follow-up. Such a professional approach should be followed by other member states.



EAPN-Portugal: Transnational project visit to Spain

## PRACTICAL STEPS TO POST-EQUAL

For post-EQUAL *nationally*, one must be familiar with the national operational programmes, assess the degree to which EQUAL principles (partnership, empowerment, innovation) are incorporated and look out for the subsequent openings (e.g. calls for proposals) and apply accordingly (> Chapter 3). For post-EQUAL *transnationally*, for social inclusion NGOs, the key steps appear to be as follows:

### PRACTICAL STEPS TO A POST-EQUAL TRANSNATIONAL PARTNERSHIP

Practical steps to a post-EQUAL transnational partnership	
1	Find out what provision is made for transnationality: themes, amounts available, co-financing, conditions, calls for proposals
2	Find the national contact point from your national structural funds authorities
3	If there are still possibilities, prepare a project, which may vary in theme, size, scope and ambition
4	Contact other projects which have post-EQUAL experience
5	Find transnational partners, co-funding
6	Make proposal

If there is no provision for post-EQUAL, the matter should be taken up with the managing authority so that it may be rectified. If it is not, then there should be a formal complaint made to the European Commission.

### CHECKLIST FOR SOCIAL INCLUSION NGOS

- Is there provision for post-EQUAL in the NSRF of the operational programmes? What exactly is the nature of the provision? Does it comply with the requirements of the Community Strategic Guidelines for partnership, gender mainstreaming, innovation and transnationality?
- How is the member state planning to operationalize the principles? Like France and Germany, will there be a specific budget and an annual call for proposals? Or will transnational elements be built into mainstream ESF calls for proposals?
- Are you in touch with the national contact point for transnationality?
- If EQUAL principles are not evident in the operational programmes, how can you persuade the member states to rectify the situation? Have you contacted the Commission (in the first instance, the desk officer) about the situation? Is a formal complaint merited?

**CHAPTER 8****PREPARING FOR THE CHALLENGES OF 2014-2020**

Even though the present round of the structural funds is only just under way, preparations will soon start for the next round. Here, the last chapter of the manual looks at the challenges that lie ahead for social inclusion NGOs.

**INTRODUCING THE CHALLENGES**

Even though the next round the structural funds is several years away (the new programming period will begin in 2014 and last until 2020), the design of the new round gets under way long before then. One has to calculate the timetable by working backwards here. Introducing new regulations to govern the new round can take up to two years (2011-2013). The outline policy documents for the new round may therefore be expected in 2010-11.

The debate on the new round of the structural funds, will, if previous rounds are a useful guide, take place at two levels. First, there is the level of issues that most concern governments. Second, there is the bundle of concerns that concern social policy. At times, there can be two debates which do not connect to one another at all. At government level, the main interests are:

- How large should the structural funds be as a proportion of the European budget? How much should they re-distribute from the richer regions to the poorer regions?
- How much should the structural funds be decided, operated and managed by the Commission in Brussels and how much in the member states (the theory and practice of 'subsidiarity').
- How much should the design of the structural funds continue to be simplified? ('simplification'). Will the ESF and ERDF be merged? Should projects be smaller in number but larger in size ('massification')?

As chapter 1 noted, the 2007-2013 round saw the role of the structural funds maintained, but with distinct trends toward more subsidiarity and simplification. These themes may re-emerge for 2014-2020. Coming up to the introduction of the 2007-2013 round, the British government made a strong pitch for a reduction in the role of the structural funds in redistributing resources from richer to poorer regions, arguing that the structural funds recycled money ineffectively at great expense: member states should develop their regions themselves. This approach was called 're-nationalization' and it was strongly resisted by the Commission and most member states, including the new ones who had most to lose. In the run-up to 2014, issues of re-nationalization, subsidiarity and simplification may emerge again.

The basket of concerns in the social policy area featured much less strongly in the introduction of both the 2000-6 and 2007-2013 rounds, but were not entirely absent either. Social policy advocates, like EAPN, argued that:

- The structural funds have the potential to make a significant impact on social inclusion;
- The structural funds should be about *social* inequality as much as about *regional* inequality. The ESF should be as important as the ERDF;
- As important as the size and the underlying assumptions of the funds are the *methods* to be used. Here, social policy NGOs stressed the importance of the partnership principle (involving NGOs in the design and operation of the funds), targeting of the most excluded, transparency, facilitating the involvement of social inclusion NGOs (e.g. technical assistance, global grants) and effective systems for indicators, monitoring and evaluation.

In the approach of the 2014-2020 round, some of these issues will likely feature again in the debates at European and national level. From 2011, national, regional and local governments may begin to hold conferences to plan out their approach to the next round of the structural funds and in some countries may organize structured consultations. Experts and institutes may also contribute. Here, it is important that social inclusion NGOs make the case for:

- Structural funds to be effective in combating exclusion;
- The funds to be rebalanced in favour of social, as well as regional objectives;
- Methods of the structural funds to emphasize partnership, targeting, transparency, systems to involve social inclusion NGOs and effective indicators, monitoring and evaluation;
- Space to be found for a role in grass roots, street level NGOs bringing in social innovation and their experience of working with the most marginalized;
- The Commission to use its authority to ensure observance of the principles of partnership and the application of social inclusion as a priority across the funds, with a meaningful role for social NGOs.

### NGOS CONTRIBUTING TO THE DEBATE

Bulgarian NGOs have pointed out that working on the structural funds is a never-ending process. Each round is a long sequence of events that starts with programme design and ends with impact evaluation, but before that happens, a new round is already in design. With all their experience of the structural funds - and the frustrations that can arise - social inclusion NGOs should have a lot to say about the future of the structural funds. But how effective are NGOs in making that contribution? From 2010 onward, we may expect regional and national governments to start organizing discussions on 2014-2020 - but NGOs are not often told about these meetings and do not organize themselves to find out. This re-emphasizes the importance of NGOs being in dialogue with all the structural funds actors already and getting involved



in these discussions at the earliest stage, when ideas and concepts are still relatively open (> Chapter 2).

## CHECKLIST FOR SOCIAL INCLUSION NGOS

- ☑ What steps have you taken to follow the structural funds debate from 2010, as the first preparations are made for the new round?
- ☑ What plans do social inclusion NGOs have to make social inclusion visible and prominent in the debate coming up to 2014? What is the intensity and quality of the dialogue with the other structural funds actors?
- ☑ What proposals should social inclusion NGOs make for 2014-2020? How can social inclusion be more prominent and more extensive use be made of methods that work (e.g. global grants, technical assistance, capacity-building)?
- ☑ Have you been able to encourage consideration of the structural funds in plans for the *European year against poverty, 2010*?



Participation creates new personal and work opportunities – CEPAIM, member of EAPN-Spain

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This is the third in a series of manuals published by the European Anti Poverty Network (EAPN) for its members and more broadly for social inclusion Non Governmental Organizations (NGOs) determined to ensure that the structural funds are effective instruments for making Europe a more inclusive society.

While previous manual outlined the present, 2007–2013 round of the structural funds at their point of introduction, this manual's main aim is rather to focus on how NGOs can be a critical voice for social inclusion in the structural funds; how to use the opportunities that are still there; how to participate in the post – EQUAL arrangements; and to provide first guidance in how to look to the next structural funds round (2014–2020).



EUROPEAN ANTI POVERTY NETWORK

Since 1990, the European Anti Poverty Network (EAPN) has been an independent network of non-governmental organisations (NGOs) and groups involved in the fight against poverty and social exclusion in the Member States of the European

Union. Together the membership of EAPN aims to put the fight against poverty high on the agenda of the EU and to ensure cooperation at EU level aimed at the eradication of poverty and social exclusion.

For more information: [www.eapn.eu](http://www.eapn.eu)